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Harmonizing Criminal Law with Islamic Ethics, Economic Justice, and Legal Education: A Comparative Analysis of Selected OIC Countries

Mohammad Nasr Khater^{1*}, Majd Waleed Almanasra², Samat Turmanov³, Anis Mashdurohatun⁴, Haryoko Ari Prabowo⁵, Bayu Novrian Dinata⁶, Amir Akbar Nurul Qomar⁷, Sabrul Iman⁸

¹Applied Science Private University

Email: mo_khater@asu.edu.jo

<https://orcid.org/0000-0001-7904-3780>

²United Arab Emirates University, Al Ain, United Arab Emirates

<https://orcid.org/0000-0002-1157-9324>

Email: dr.manasra@uaeu.ac.ae

³lecturer in Islamic studies, Nur-Mubarak Egyptian University of Islamic Culture, Almaty, Kazakhstan.

Email: turmanovsamat@gmail.com

⁴Universitas Islam Sultan Agung, Semarang, Indonesia.

Email: anism@unissula.ac.id

⁵Universitas Islam Sultan Agung, Semarang, Indonesia.

Email: Sibowes248@gmail.com

⁶Universitas Islam Sultan Agung, Semarang, Indonesia.

Email: bayunovriandinata@yahoo.com

⁷Universitas Islam Sultan Agung, Semarang, Indonesia.

Email: amir.akbarqomar@gmail.com

⁸Universitas Islam Sultan Agung, Semarang, Indonesia.

Email: sabrul.iman@gmail.com

ABSTRACT: The increasing complexity of transnational crime, socioeconomic inequality, and legal pluralism has intensified the need for criminal justice reforms across the member states of the Organization of Islamic Cooperation (OIC). Despite sharing common Islamic ethical values, OIC countries exhibit considerable diversity in their constitutional structures, legal traditions, and criminal justice systems, creating significant challenges for legal harmonization. This study examines the relationship between criminal law, Islamic ethics, economic justice, and legal education through a comparative analysis of Pakistan, Malaysia, Indonesia, Saudi Arabia, Jordan, and Turkey. Employing a qualitative doctrinal and comparative legal methodology, the study analyzes constitutional provisions, criminal legislation, Islamic legal principles, policy frameworks, and contemporary scholarly literature to evaluate how these jurisdictions integrate Islamic ethical values into modern criminal justice systems. The findings reveal that although the selected countries differ in the application of Islamic law, they share common normative commitments to justice, accountability, public welfare, and the protection of human dignity. The analysis further demonstrates that sustainable criminal justice reform cannot

rely solely on punitive legal measures but must also address structural socioeconomic factors and strengthen legal education to enhance institutional effectiveness. The principal contribution of this study is the development of an Integrated Criminal Law Harmonization Framework, consisting of four interconnected pillars: Islamic Ethical Governance, Economic Justice Policies, Modern Criminal Law Reform, and Transformative Legal Education. The proposed framework provides a comprehensive model for reducing crime, strengthening the rule of law, improving judicial legitimacy, protecting human rights, and promoting sustainable development while accommodating the constitutional and legal diversity of OIC member states. The study contributes to comparative criminal law scholarship by offering an interdisciplinary framework that bridges Islamic legal philosophy with contemporary criminal justice theory and policy.

1. INTRODUCTION

The twenty-first century has witnessed profound transformations in criminal justice systems driven by globalization, technological advancement, economic restructuring, and evolving international human rights standards. These developments have generated significant challenges for the member states of the Organization of Islamic Cooperation (OIC), many of which maintain legal systems characterized by varying degrees of interaction between Islamic law (Sharia), civil law, and common law traditions. As societies become increasingly interconnected through international trade, migration, digital communication, and transnational crime, the demand for criminal justice systems that are both internationally compatible and locally legitimate has intensified. Consequently, harmonizing criminal law with Islamic ethical principles, economic justice, and legal education has emerged as one of the most significant legal policy debates across the Islamic world. Criminal law serves not only as an instrument for punishing unlawful conduct but also as a mechanism for protecting public order, preserving social stability, safeguarding human dignity, and promoting justice. Contemporary criminal justice scholarship increasingly recognizes that effective criminal law cannot be assessed solely by the severity of punishments or procedural efficiency. Rather, it must also be evaluated according to its ability to promote fairness, prevent crime, reduce social inequalities, uphold fundamental rights, and strengthen public confidence in legal institutions. Within many OIC countries, these objectives are closely associated with Islamic ethical values, which emphasize justice ('adl), mercy (rahmah), public welfare (maṣlaḥah), accountability (amānah), and the preservation of the objectives of Islamic law (Maqāṣid al-Sharī'ah). These ethical foundations offer a comprehensive normative framework capable of complementing modern criminal justice reforms while remaining responsive to the religious and cultural contexts of Muslim societies. (Oseni and Adio 2026)

Despite these shared ethical principles, criminal justice systems among OIC member states display remarkable diversity. Countries such as Saudi Arabia continue to rely extensively on classical Islamic jurisprudence, while others, including Turkey, primarily operate secular criminal codes influenced by European legal traditions. Pakistan has developed a hybrid legal structure combining common law institutions with selected Islamic criminal provisions, Jordan occupies a middle position: Islam is the state religion, but criminal jurisdiction remains with ordinary courts, while Sharia courts exercise limited constitutional jurisdiction, whereas Malaysia and Indonesia employ pluralistic legal frameworks in which Islamic criminal law coexists with civil and customary legal systems. This diversity reflects differing constitutional arrangements, colonial legacies, judicial traditions, political priorities, and interpretations of Islamic jurisprudence. As a result, significant disparities exist regarding criminal legislation, judicial discretion, sentencing policies, evidentiary standards, procedural safeguards, and the institutional role of Islamic ethics in criminal justice administration. (Abdul Kodir et al. 2025)

The increasing complexity of contemporary crime further reinforces the need for legal harmonization. Cybercrime, financial fraud, corruption, money laundering, terrorism financing, organized crime, human trafficking, environmental offences, and digital privacy violations transcend national boundaries and require coordinated legal responses. OIC countries increasingly participate in international conventions addressing these issues while simultaneously seeking to preserve their constitutional identities and Islamic legal traditions. Balancing international obligations with domestic religious and cultural values therefore represents one of the central challenges confronting criminal law reform in the Muslim world. (Agustina and Ismah 2024)

Another contemporary challenge concerns the relationship between crime and economic inequality. Extensive criminological research demonstrates that persistent poverty, unemployment, unequal access to education, social exclusion, corruption, and

economic injustice significantly contribute to criminal behaviour. Rapid urbanization, demographic growth, inflation, youth unemployment, and widening income disparities have intensified these pressures in many developing economies. From an Islamic perspective, crime prevention cannot be separated from social and economic justice. Islamic legal philosophy recognizes that society bears collective responsibilities for ensuring equitable distribution of wealth, protecting vulnerable populations, and eliminating structural conditions that foster criminal behaviour. Institutions such as zakat, waqf, charitable endowments, ethical commerce, and the prohibition of exploitative financial practices reflect a broader commitment to socioeconomic justice that extends beyond conventional criminal sanctions. Consequently, integrating economic justice into criminal law reform offers an important avenue for developing more preventive, equitable, and socially sustainable criminal justice systems. (Ahmad and Aman 2021)

Recent global events have further exposed structural weaknesses within criminal justice institutions. The COVID-19 pandemic placed unprecedented pressure on courts, prisons, law enforcement agencies, and correctional systems across the world. Prison overcrowding, delayed judicial proceedings, unequal access to legal representation, and growing concerns regarding prisoners' health highlighted the necessity of criminal justice reforms that prioritize human dignity alongside public security. Simultaneously, advances in digital technology have transformed criminal investigations through artificial intelligence, predictive policing, digital surveillance, biometric identification, and electronic evidence. (Al-Billeh et al., 2024) While these innovations improve law enforcement capabilities, they also generate significant ethical and legal concerns regarding privacy, accountability, due process, algorithmic bias, and proportionality. Islamic ethical principles concerning justice, transparency, accountability, and respect for human dignity provide valuable normative guidance for evaluating the legitimacy of emerging criminal justice technologies. (Akhtar 2024)

Legal education constitutes another critical yet often overlooked component of criminal justice reform. Effective harmonization cannot be achieved solely through legislative amendments; it also requires judges, prosecutors, lawyers, police officers, legislators, and legal scholars to possess comprehensive knowledge of both contemporary criminal law and Islamic legal ethics. However, legal education in several OIC countries continues to exhibit fragmentation between secular legal studies and traditional Islamic jurisprudence. Many law faculties emphasize statutory interpretation and procedural law while providing limited engagement with Islamic ethical theory, comparative legal analysis, restorative justice, criminology, or international human rights law. Conversely, traditional Islamic institutions often prioritize classical jurisprudential methodologies without extensive examination of modern criminal legislation, constitutional law, or comparative legal systems. Bridging this educational divide is essential for cultivating legal professionals capable of developing balanced, context-sensitive, and ethically grounded criminal justice reforms. (Akhtar 2026)

Islamic ethics offers a distinctive perspective on criminal justice by emphasizing prevention before punishment, moral responsibility alongside legal accountability, reconciliation where appropriate, proportionality in sentencing, protection of victims' rights, rehabilitation of offenders, and preservation of social harmony. These principles correspond closely with many contemporary developments in restorative justice, community-based sentencing, victim-offender mediation, and evidence-based crime prevention. Rather than viewing Islamic criminal law as static or exclusively punitive, many contemporary scholars advocate contextual interpretations grounded in the objectives of Sharia (Maqāṣid al-Sharī'ah), which prioritize the protection of religion, life, intellect, lineage, and property. Such approaches provide opportunities for constructive dialogue between Islamic legal philosophy and modern criminal justice theory. (Akram, Hayat, and Ali 2025)

Although numerous studies have examined Islamic criminal law, comparative criminal justice, legal harmonization, or criminal justice reform independently, relatively few have investigated the intersection of criminal law, Islamic ethics, economic justice, and legal education within a unified comparative framework. Existing scholarship frequently concentrates on doctrinal analyses of ḥudūd punishments, constitutional debates concerning Islamization, or isolated national case studies. Comparatively limited attention has been devoted to understanding how ethical governance, socioeconomic justice, and legal education collectively influence criminal justice reform across different OIC jurisdictions. Furthermore, the growing impact of digitalization, globalization, sustainable development, and international legal cooperation has created new policy challenges that remain insufficiently integrated into contemporary comparative legal scholarship. (AL-Khalaileh, Al-Billeh, and Manasra 2024)

This study addresses these gaps by proposing a multidimensional framework for harmonizing criminal law with Islamic ethics, economic justice, and legal education in selected OIC countries. Rather than treating criminal law exclusively as a punitive legal institution, the research conceptualizes criminal justice as an integrated governance system influenced by ethical values,

economic structures, educational institutions, and constitutional frameworks. Through comparative analysis of selected jurisdictions, the study identifies common principles, institutional differences, and reform strategies that may contribute to more coherent and socially responsive criminal justice systems throughout the Islamic world.

The primary objective of this research is to examine how Islamic ethical principles may be effectively integrated into contemporary criminal law while remaining consistent with constitutional governance, international legal standards, and evolving societal needs. A second objective is to explore the relationship between economic justice and crime prevention, particularly regarding how Islamic socioeconomic institutions may strengthen preventive criminal justice policies. A third objective is to evaluate the role of legal education in preparing legal professionals capable of implementing ethically informed and internationally compatible criminal justice reforms. Finally, the study seeks to develop a comprehensive harmonization framework that can assist policymakers, legislators, judicial institutions, and academic communities in advancing sustainable criminal justice reform across OIC member states.

To achieve these objectives, the research addresses the following questions:

1. How do selected OIC countries integrate Islamic ethical principles into their criminal law systems?
2. What role does economic justice play in promoting crime prevention and strengthening criminal justice institutions within Islamic legal frameworks?
3. How can legal education facilitate the harmonization of criminal law with Islamic ethics and contemporary international legal standards?
4. What similarities and differences characterize criminal justice reforms among selected OIC countries?
5. What integrated harmonization framework can be proposed to guide future criminal law reforms within OIC member states?

The study employs a qualitative doctrinal and comparative legal methodology. It analyses constitutional provisions, criminal codes, judicial decisions, Islamic legal sources, policy documents, international legal instruments, and contemporary academic literature. Comparative examination of selected OIC jurisdictions enables identification of convergent and divergent approaches to criminal justice while highlighting institutional innovations that may be transferable across national contexts. The analytical framework is informed by comparative law, criminal justice theory, Maqāṣid al-Sharī'ah, and principles of ethical governance.

The contribution of this study extends beyond conventional comparative analyses of criminal legislation. It advances an interdisciplinary model that integrates criminal law reform with Islamic ethical governance, economic justice, and legal education, thereby providing a more comprehensive understanding of sustainable criminal justice development in Muslim-majority societies. The proposed framework contributes to contemporary debates concerning legal pluralism, comparative criminal law, Islamic legal reform, and governance by demonstrating that effective criminal justice requires not only sound legislation but also ethical institutions, equitable socioeconomic policies, and high-quality legal education. By synthesizing these interconnected dimensions, the study offers both theoretical insights and practical policy recommendations for legislators, judges, legal educators, and regional organizations seeking to strengthen criminal justice systems throughout the OIC while preserving their Islamic legal and ethical identity in an increasingly interconnected world.

2. MATERIALS AND METHODS

2.1 Study Material

This study adopts a qualitative doctrinal and comparative legal research design to examine the harmonization of criminal law with Islamic ethics, economic justice, and legal education in selected Organization of Islamic Cooperation (OIC) countries. The primary materials consist of constitutional provisions, criminal codes, judicial decisions, statutory regulations, and official policy documents from Pakistan, Malaysia, Indonesia, Saudi Arabia, Jordan, and Turkey. Islamic legal sources, including the Qur'an, the Sunnah, and classical as well as contemporary jurisprudential literature, are incorporated to establish the ethical and normative foundations of the analysis. Secondary materials include peer-reviewed journal articles, books, reports published by the Organization of Islamic Cooperation (OIC), the United Nations Office on Drugs and Crime (UNODC), the World Bank, the Organisation for Economic Co-operation and Development (OECD), and other authoritative publications addressing criminal justice reform, Islamic law, economic justice, and legal education.

2.2 Data Collection

Data were collected through a comprehensive review of legal, academic, and institutional sources published primarily between 2020 and 2026 to ensure the relevance of the analysis to contemporary criminal justice reforms. National constitutions, penal codes, criminal procedure legislation, judicial decisions, government policy documents, and international legal instruments were systematically examined. Academic literature was identified through leading legal and multidisciplinary databases, including Scopus, Web of Science, HeinOnline, Google Scholar, and official government repositories. The selection of Pakistan, Malaysia, Indonesia, Saudi Arabia, Jordan, and Turkey was based on their diverse legal traditions, varying approaches to integrating Islamic law within national legal systems, and their significance as representative OIC member states.

2.3 Comparative Analytical Procedure

The study employs a comparative legal methodology to evaluate similarities and differences among the selected jurisdictions. Analysis was conducted using four predetermined analytical dimensions: (i) criminal law framework, (ii) integration of Islamic ethical principles, (iii) economic justice policies relevant to crime prevention, and (iv) legal education and judicial training. The comparative assessment also considered constitutional structures, legislative reforms, institutional arrangements, and contemporary criminal justice policies. Findings from each jurisdiction were synthesized to identify common principles, institutional variations, and best practices that could contribute to a harmonized criminal justice framework for OIC countries.

2.4 Analytical Methods

The research combines doctrinal legal analysis, comparative legal analysis, and thematic content analysis. Doctrinal analysis was used to interpret constitutional provisions, criminal legislation, judicial decisions, and Islamic legal principles governing criminal justice. Comparative analysis facilitated the identification of converging and diverging legal approaches among the selected countries. Thematic analysis was applied to organize findings into four conceptual domains: Islamic ethical governance, economic justice, criminal law reform, and legal education. The analytical framework was guided by the objectives of Islamic law (Maqāṣid al-Sharī'ah), principles of comparative criminal law, restorative justice theory, and contemporary governance literature.

2.5 Validity and Research Framework

To enhance the reliability and credibility of the findings, the study employed source triangulation by integrating primary legal materials with contemporary scholarly literature and reports from recognized international organizations. Preference was given to recent, peer-reviewed publications and official legal documents to ensure analytical accuracy. The proposed Integrated Criminal Law Harmonization Framework was developed through a synthesis of the comparative findings and existing theoretical perspectives rather than through empirical testing. Accordingly, the framework represents a normative and policy-oriented model designed to assist legislators, judicial institutions, legal educators, and policymakers in strengthening criminal justice systems across OIC member states while promoting Islamic ethical values, economic justice, the rule of law, and sustainable development.

3. RESULTS AND DISCUSSION

Theoretical and Conceptual Framework

This study is grounded in an interdisciplinary theoretical framework that integrates criminal law theory, Islamic ethical principles, economic justice, and legal education. Rather than treating criminal law as a purely punitive mechanism, the framework conceptualizes it as a multidimensional institution that promotes justice, social order, ethical governance, and sustainable development. By combining modern criminological theories with the normative objectives of Islamic law (Maqāṣid al-Sharī'ah), the study provides a comprehensive analytical lens for examining criminal justice reforms in selected Organization of Islamic Cooperation (OIC) countries.

Criminal Law Theory

Modern criminal law is informed by several complementary theories that explain the purposes of punishment and crime prevention. Retributive justice considers punishment a moral response to wrongdoing, emphasizing proportionality and accountability. Under this theory, offenders deserve punishment because they have violated legal and moral norms, thereby

restoring the balance of justice. While retribution remains an important element of many criminal justice systems, contemporary legal scholarship increasingly argues that punishment should also contribute to broader social objectives. Deterrence theory views punishment as a means of discouraging criminal behavior. It distinguishes between specific deterrence, which seeks to prevent repeat offending by an individual, and general deterrence, which discourages others from committing similar crimes. The effectiveness of deterrence depends not only on the severity of sanctions but also on the certainty and swiftness of law enforcement, judicial efficiency, and public confidence in legal institutions. In contrast, restorative justice emphasizes repairing the harm caused by crime through dialogue, reconciliation, victim participation, offender accountability, and community involvement. Rather than focusing exclusively on punishment, restorative justice seeks to rebuild social relationships and reduce recidivism. Its principles closely align with contemporary approaches to victim-centered justice and rehabilitation.(Ali and Aljahsh 2025)

Islamic Ethical Foundations

Islamic criminal justice is fundamentally guided by ethical principles derived from the Qur'an, the Sunnah, and the objectives of Islamic law (Maqāṣid al-Sharī'ah). The Maqāṣid framework seeks to preserve five essential values: religion (dīn), life (nafs), intellect ('aql), lineage (nasl), and property (māl). Contemporary scholars also emphasize the protection of human dignity, freedom, and public welfare. These objectives provide a flexible normative framework for evaluating criminal law reforms while balancing legal certainty with social justice. The principle of **justice ('adl)** occupies a central position in Islamic legal philosophy. Justice requires equality before the law, impartial adjudication, proportional punishment, and protection of individual rights regardless of social status. It also requires procedural fairness, judicial independence, and accountability within criminal justice institutions. **Iḥsān** extends beyond legal obligation by encouraging excellence, compassion, forgiveness, and moral responsibility. Within criminal justice, this principle supports rehabilitation, reconciliation, restorative practices, and humane treatment of offenders while maintaining accountability for unlawful conduct. The principle of **amānah** (trustworthiness) emphasizes integrity, honesty, and responsibility in exercising public authority. Judges, prosecutors, legislators, police officers, and public officials are entrusted with safeguarding justice and preventing abuses of power. Strong institutional accountability reflects this ethical obligation. Closely related is the concept of **karāmah** (human dignity), which affirms the inherent dignity of every individual. Respect for human dignity requires fair trials, protection against arbitrary punishment, prohibition of torture, humane prison conditions, and rehabilitation opportunities. These values reinforce the compatibility of Islamic ethics with internationally recognized principles of human rights and criminal justice.(Aljadi, Mayhub, and Ahmoudah 2025)

Economic Justice and Crime

Economic conditions significantly influence criminal behavior and social stability. Persistent poverty, unemployment, wealth inequality, corruption, and social exclusion increase the likelihood of crime by limiting legitimate economic opportunities and weakening public trust in state institutions. Consequently, criminal justice reform should incorporate policies that address the structural causes of criminality rather than relying solely on punitive measures. Islamic economic principles promote distributive justice through equitable wealth circulation, ethical commercial practices, and social solidarity. Institutions such as **zakat** function as compulsory wealth redistribution mechanisms that support disadvantaged members of society and reduce socioeconomic inequalities. Similarly, **waqf** institutions finance education, healthcare, social welfare, and community development, thereby addressing conditions that often contribute to criminal activity. The prohibition of **riba** (usury) reflects Islam's commitment to financial fairness and the prevention of economic exploitation. Islamic finance encourages risk-sharing, productive investment, and ethical business conduct, contributing to long-term economic stability. Together, these principles demonstrate that economic justice is not merely a social policy objective but an essential component of crime prevention and sustainable criminal justice.(Andri Winjaya Laksana et al. 2025)

Legal Education

Legal education plays a fundamental role in strengthening criminal justice systems by preparing competent, ethical, and socially responsible legal professionals. Effective criminal law reform depends not only on legislation but also on the quality of legal training received by judges, prosecutors, lawyers, law enforcement officers, and policymakers. Ethics should be integrated throughout legal education to cultivate professional integrity, judicial independence, and respect for the rule of law. Judicial education is equally important, enabling judges to respond effectively to emerging legal issues such as cybercrime, artificial intelligence, financial crimes, and international human rights standards while remaining sensitive to Islamic ethical

principles. Beyond professional training, public legal awareness enhances access to justice by educating citizens about their rights, responsibilities, and legal remedies. Well-informed communities are more likely to comply with the law, cooperate with law enforcement, and resolve disputes peacefully. (Arisa et al. 2025)

Comparative Analysis of Selected OIC Countries

Comparative legal analysis provides an effective methodology for examining how different legal systems reconcile Islamic ethical principles with contemporary criminal justice objectives. Although the selected member states of the Organization of Islamic Cooperation (OIC)—Pakistan, Malaysia, Indonesia, Saudi Arabia, and Turkey—share a predominantly Muslim population, their criminal justice systems have evolved through distinct historical, constitutional, political, and legal trajectories. These differences have produced varying approaches to criminal law reform, the application of Islamic ethical principles, economic justice policies, and legal education. This section compares these jurisdictions to identify convergent principles, institutional innovations, and challenges relevant to criminal law harmonization.

Criminal Law Framework

Pakistan

Pakistan operates a hybrid criminal justice system combining the common law tradition inherited from British colonial rule with constitutional recognition of Islamic principles. The Pakistan Penal Code, the Code of Criminal Procedure, and various special criminal statutes constitute the principal legal framework. Since the Islamization reforms initiated in the late twentieth century, legislation such as the Hudood Ordinances and subsequent amendments has incorporated selected Islamic criminal law principles while maintaining conventional criminal procedures for most offences. The Federal Shariat Court reviews legislation for conformity with Islamic injunctions, creating a unique institutional mechanism for integrating constitutional and Islamic legal norms.

Malaysia

Malaysia maintains a dual legal system in which federal criminal law applies throughout the country, while state governments administer Islamic criminal law within constitutionally prescribed limits. The Penal Code governs most criminal offences, whereas Sharia Courts possess jurisdiction over personal status matters and selected offences involving Muslims. This constitutional division has enabled coexistence between civil and Islamic legal institutions but has also generated debates concerning jurisdictional boundaries and legal consistency.

Indonesia

Indonesia follows a civil law system influenced by Dutch legal traditions while recognizing Islamic law in limited constitutional and regional contexts. The recently enacted Criminal Code reflects national legal reform efforts emphasizing restorative justice, proportionality, and modernization. Aceh Province exercises broader authority to implement Islamic criminal regulations under its special autonomous status, illustrating Indonesia's pluralistic legal structure.

Saudi Arabia

Saudi Arabia's criminal justice system is primarily founded upon Islamic law derived from the Qur'an and the Sunnah, interpreted predominantly according to the Hanbali school of jurisprudence. Recent reforms have introduced codification in several legal areas, strengthened procedural safeguards, and modernized judicial administration as part of Vision 2030. Nevertheless, Islamic jurisprudence remains the principal source of criminal law and judicial reasoning.

Jordan

Jordan occupies an intermediate position between Saudi Arabia's Sharia-centred model and Turkey's predominantly secular system, while differing from Malaysia's dual jurisdiction and Indonesia's regional pluralism. Although Islam is the state religion, ordinary courts exercise general criminal jurisdiction, while Sharia courts are constitutionally limited to specified matters, including certain diya claims. Thus, Islamic jurisprudence is not the general source of criminal offences and penalties. The Penal Code No. 16 of 1960 remains the principal statutory source and affirms legality, while the 2025 reforms expanded alternatives to imprisonment, reinforcing rehabilitative tendencies within Jordan's statutory framework (Ehjelah 2025).

Turkey

Turkey maintains a secular criminal justice system modeled largely on European civil law traditions. The Turkish Penal Code emphasizes legality, proportionality, judicial independence, and protection of constitutional rights. Although Islamic ethical values continue to influence public discourse and social norms, criminal legislation is not formally based upon Sharia. Turkey therefore represents an important comparative example of a Muslim-majority country operating under a secular constitutional framework. (Muhammad Azam et al. 2025)

Islamic Ethical Principles

The influence of Islamic ethics varies considerably among the selected jurisdictions.

Saudi Arabia explicitly grounds criminal justice within Islamic jurisprudence, where principles such as **‘adl** (justice), **rahmah** (mercy), **amānah** (trustworthiness), and the objectives of Sharia (Maqāṣid al-Sharī‘ah) directly guide judicial interpretation.

Pakistan constitutionally requires laws to conform to Islamic injunctions while maintaining statutory criminal legislation. Consequently, Islamic ethics influence both constitutional review and legislative reform, although practical implementation frequently depends upon statutory interpretation and judicial precedent.

Malaysia adopts a balanced approach by incorporating Islamic ethical values primarily through the Sharia legal system while preserving a modern statutory criminal code applicable to all citizens. Ethical principles influence judicial reasoning without replacing constitutional legal structures.

Indonesia emphasizes religious harmony and public morality through the philosophical foundation of **Pancasila**. Islamic ethical principles significantly influence public policy and regional legislation, particularly in Aceh, while national criminal law remains formally secular.

Jordan reflects a constitutionally bounded form of Islamic ethical integration. Article 2 establishes Islam as the state religion, but Articles 102–106 preserve ordinary-court primacy in criminal matters while assigning Sharia courts exclusive jurisdiction only over specified fields, including diya claims. (Samara 2024)

Turkey, although constitutionally secular, continues to reflect ethical concepts rooted in Islamic civilization through broader cultural values emphasizing justice, integrity, public responsibility, and social solidarity rather than explicit religious legislation.

Across all five countries, justice, accountability, protection of human dignity, and social welfare emerge as common normative objectives despite differences in legal methodology. (Azam, Abdul-Majeed Hamdoun, et al. 2025)

Economic Justice Policies

Economic justice constitutes an increasingly important dimension of crime prevention.

Pakistan has strengthened anti-corruption institutions, expanded social protection programmes such as the Benazir Income Support Programme, and promotes Islamic banking and zakat administration. Nevertheless, corruption, unemployment, and socioeconomic inequality continue to influence criminal behaviour.

Malaysia combines effective public administration with Islamic financial institutions, zakat management, waqf development, and relatively advanced anti-corruption mechanisms. These policies contribute to broader socioeconomic stability, although governance challenges remain.

Indonesia has expanded poverty reduction initiatives, digital financial inclusion, Islamic banking, and community-based social assistance. Large-scale anti-corruption reforms have been undertaken through institutional mechanisms, (Purnomo et al., 2025) although implementation challenges persist.

Saudi Arabia has diversified its economy under Vision 2030 while modernizing anti-corruption institutions and strengthening charitable foundations, zakat administration, and Islamic financial regulation. These initiatives aim to reduce economic vulnerabilities associated with criminal activity.

Jordan combines statutory zakat with broader fiscal redistribution: progressive taxation, social justice, and anti-corruption mechanisms. It therefore resembles Malaysia and Saudi Arabia in institutionalizing zakat, but Turkey in embedding redistribution within general state fiscal structures.

Turkey relies primarily upon conventional fiscal and social welfare policies supported by expanding participation banking and charitable institutions. Economic volatility, inflation, and unemployment have nevertheless presented continuing challenges for crime prevention.

The comparative evidence suggests that sustainable criminal justice requires integration of criminal sanctions with broader economic justice policies that address structural causes of crime. (Muhammad Azam, Naji Mohammad Alwreikat, et al. 2026)

Legal Education System

Legal education significantly influences criminal justice reform.

Pakistan offers legal education through universities, judicial academies, and Islamic institutions; however, integration between Islamic jurisprudence and modern criminal law remains inconsistent.

Malaysia has developed relatively advanced legal education combining common law instruction with Islamic legal studies. Continuous judicial training and professional legal development contribute to institutional capacity.

Indonesia emphasizes legal pluralism within university curricula while expanding judicial education concerning restorative justice, constitutional law, and comparative legal studies.

Saudi Arabia has modernized legal education through curriculum reform, judicial specialization, and professional training while maintaining strong foundations in Islamic jurisprudence.

Jordan advances continuing judicial education through its Judicial Institute, whose 2025 training on Penal Code reforms linked legislative change to implementation, reinforcing the transformative-education pillar.

Turkey follows European-style legal education emphasizing constitutional law, criminal procedure, comparative law, and human rights. Judicial academies provide continuous professional education for judges and prosecutors.

Across all jurisdictions, greater integration of ethics, comparative criminal law, criminology, digital crime, and Islamic legal philosophy would strengthen future criminal justice reforms. (Muhammad Azam, Rawdah Abdul Karim Mohammad Pharaon, et al. 2026)

Major Challenges

Despite recent reforms, several common challenges remain.

Pakistan continues to experience institutional capacity constraints, procedural delays, prison overcrowding, and inconsistencies in harmonizing Islamic and statutory criminal law.

Malaysia faces constitutional debates concerning the relationship between civil courts and Sharia courts, particularly regarding jurisdictional overlap.

Indonesia must balance national legal uniformity with regional autonomy, particularly concerning Aceh's implementation of Islamic criminal law.

Saudi Arabia continues to modernize judicial procedures while balancing codification with traditional jurisprudential flexibility.

Jordan's challenge is to address gaps in the 2025 alternatives to imprisonment while balancing deterrence and accountability with rehabilitation (Al-Billeh & Issa, 2022).

Turkey faces challenges associated with judicial independence, constitutional reform debates, digital crime, migration, and transnational organized crime.

Across all six jurisdictions, globalization, cybercrime, artificial intelligence, financial crimes, environmental offences, (Alshible et al., 2023) and international legal cooperation present emerging challenges requiring continuous criminal law reform. (Azam, Mashdurohatun, et al. 2025)

Comparative Analysis

Dimension	Pakistan	Malaysia	Indonesia	Saudi Arabia	Turkey	Jordan
Legal Tradition	Common law–Islamic hybrid	Dual civil–Sharia system	Civil law with legal pluralism	Classical Islamic law with increasing codification	Secular civil law	Statutory law; limited Sharia jurisdiction
Islamic Ethical Integration	High	Moderate–High	Moderate	Very High	Indirect	Moderate (limited jurisdiction)
Criminal Law Reform	Ongoing	Continuous	Comprehensive modernization	Vision 2030 reforms	EU-oriented modernization	2025 non-custodial expansion
Economic Justice Instruments	Zakat, Islamic banking, social welfare	Zakat, waqf, Islamic finance	Islamic finance, poverty reduction	Zakat, Vision 2030 reforms	Social welfare, participation banking	Zakat Fund; progressive taxation; anti-corruption
Legal Education	Mixed secular–Islamic	Integrated model	Pluralistic model	Islamic specialization with modernization	European legal education	Judicial Institute; continuing training
Major Challenges	Institutional efficiency, legal harmonization	Jurisdictional overlap	Regional diversity	Codification and modernization	Constitutional and transnational crime issues	Implementation; jurisdictional clarity

Comparative Findings

The comparative analysis demonstrates that none of the selected jurisdictions fully integrates criminal law, Islamic ethics, economic justice, and legal education into a single comprehensive framework. Saudi Arabia represents the strongest application of Islamic jurisprudence, whereas Turkey demonstrates the operation of a secular criminal justice system within a Muslim-majority society. Pakistan, Malaysia, and Indonesia occupy intermediate positions characterized by varying degrees of legal pluralism and institutional integration. Jordan occupies an intermediate position: its criminal law is statutory and ordinary-court based, while retaining a limited Sharia role. It is thus more delimited than Malaysia, less secular than Turkey, and more codified than Saudi Arabia. Despite these differences, all six countries pursue common objectives of justice, public welfare, crime prevention, and institutional legitimacy. These shared principles provide a strong foundation for developing a harmonized criminal justice framework that accommodates constitutional diversity while remaining faithful to the ethical objectives of Islamic law.

Challenges and Opportunities for Harmonization

The harmonization of criminal law across the Organization of Islamic Cooperation (OIC) member states is a complex undertaking shaped by historical experiences, constitutional diversity, socioeconomic conditions, and varying interpretations of Islamic law. Although these countries share common religious values and broadly similar objectives of justice, public welfare, and social stability, their criminal justice systems have evolved under different legal traditions and political contexts. Consequently, efforts to establish a coherent framework that integrates Islamic ethics with modern criminal justice face numerous legal and institutional challenges. At the same time, ongoing legal reforms, increasing regional cooperation, technological advancement, and renewed emphasis on the objectives of Islamic law (Maqāṣid al-Sharī‘ah) provide significant opportunities for developing a harmonized criminal justice model that is both ethically grounded and internationally compatible.

Colonial Legacy

One of the most significant obstacles to criminal law harmonization is the enduring influence of colonial legal systems. During the nineteenth and twentieth centuries, many Muslim-majority states adopted legal codes introduced by colonial administrations. British common law significantly influenced Pakistan and Malaysia, while Dutch civil law shaped Indonesia's legal institutions. Turkey adopted continental European legal codes following the establishment of the Republic, whereas Saudi Arabia retained a legal system predominantly grounded in classical Islamic jurisprudence. These historical developments produced distinct constitutional structures, procedural rules, judicial institutions, and legislative traditions. As a result, contemporary criminal justice systems among OIC countries differ considerably regarding criminal offences, sentencing policies, evidentiary standards, judicial discretion, and constitutional review mechanisms. The coexistence of common law, civil law, customary law, and Islamic jurisprudence complicates efforts to develop uniform criminal justice standards. Nevertheless, the colonial legacy should not be viewed solely as an impediment. Many procedural safeguards inherited from common law and civil law traditions—such as due process, judicial independence, legal representation, and evidentiary standards—can complement Islamic ethical principles when interpreted through the objectives of Sharia. Harmonization therefore requires constructive integration rather than wholesale replacement of inherited legal institutions. (Azam 2025)

Human Rights Challenges

Balancing Islamic legal principles with contemporary international human rights standards remains one of the most debated issues in comparative criminal law. OIC member states are increasingly engaged with international treaties concerning civil and political rights, torture prevention, fair trial guarantees, and protection against discrimination. Simultaneously, these states seek to preserve their constitutional identity and religious values. Differences frequently emerge concerning capital punishment, corporal punishments, procedural safeguards, gender equality, freedom of religion, and the rights of criminal defendants. Critics often argue that certain interpretations of Islamic criminal law conflict with international human rights norms, whereas many Muslim scholars maintain that such tensions arise primarily from restrictive or historically contextual interpretations rather than from the fundamental objectives of Islamic law itself. Recent scholarship increasingly advocates interpreting criminal law through Maqāṣid al-Sharī'ah, emphasizing justice ('adl), mercy (raḥmah), public welfare (maṣlaḥah), and the protection of human dignity (karāmah). This purposive approach demonstrates considerable compatibility with internationally recognized principles such as proportionality, fairness, equality before the law, and protection against arbitrary punishment. Consequently, harmonization should focus on identifying shared normative principles rather than assuming inherent incompatibility between Islamic ethics and human rights. (Ahmed Abdullah Muhammed Al Dhahli, Meshari Al Daihani, and Fadillah Bt Mansor 2026)

Economic Inequality

Economic inequality constitutes another major obstacle to sustainable criminal justice reform. Extensive criminological research demonstrates that poverty, unemployment, limited educational opportunities, corruption, and unequal distribution of wealth significantly increase the likelihood of criminal activity. Punitive criminal justice policies alone cannot effectively address offences rooted in structural socioeconomic deprivation. Many OIC countries continue to experience high levels of youth unemployment, regional disparities, inflation, and unequal access to economic opportunities. These conditions contribute to property crime, corruption, organized crime, financial offences, and social instability. Consequently, criminal justice policies should incorporate preventive socioeconomic strategies alongside traditional law enforcement. Islamic economic principles provide important mechanisms for addressing these structural challenges. Zakat, waqf, charitable endowments, ethical finance, and the prohibition of riba promote equitable wealth distribution and social solidarity. Strengthening these institutions can reduce socioeconomic vulnerabilities while enhancing public confidence in legal institutions. Therefore, harmonization should integrate economic justice into criminal justice policy by recognizing that crime prevention depends not only upon effective punishment but also upon inclusive economic development and social protection. (Ahmed Abdullah Muhammed Al Dhahli, Meshari Al Daihani, and Fadillah Bt Mansor 2026)

Weak Legal Education

Legal education represents a foundational component of criminal justice reform, yet many OIC countries continue to face significant educational challenges. Law schools frequently separate the study of modern criminal law from Islamic jurisprudence, resulting in graduates who possess expertise in one discipline but limited understanding of the other. Similarly, traditional Islamic institutions may emphasize classical jurisprudence without sufficient engagement with constitutional law, comparative

legal systems, digital crime, or international human rights. Judicial training also varies considerably across jurisdictions. Judges, prosecutors, and law enforcement officials increasingly encounter complex issues involving cybercrime, financial crimes, artificial intelligence, digital evidence, environmental offences, and transnational organized crime. Without continuous professional education, criminal justice institutions may struggle to respond effectively to emerging legal challenges. Comprehensive legal education should therefore integrate criminal law, criminology, Islamic ethics, comparative law, constitutional law, forensic science, and digital technologies. Such interdisciplinary training would enhance judicial competence, strengthen ethical decision-making, and improve consistency in criminal justice administration across OIC member states. (Bagus Khusfi Satyo, S.H., M.Kn. and Bagus Agung Yuda Prasetyo, S.H., M.Kn 2026)

Political and Institutional Barriers

Political instability and institutional weaknesses continue to impede criminal law harmonization in several OIC countries. Frequent constitutional amendments, inconsistent legislative reforms, limited judicial resources, corruption, bureaucratic inefficiency, and political polarization often undermine long-term criminal justice strategies. Institutional fragmentation also presents significant challenges. In some jurisdictions, overlapping authority between civil courts, Sharia courts, constitutional courts, and administrative agencies creates uncertainty regarding jurisdiction and legal interpretation. Variations in judicial independence and law enforcement capacity further affect the consistent implementation of criminal legislation. Successful harmonization therefore requires institutional strengthening alongside legislative reform. Transparent governance, judicial independence, effective anti-corruption mechanisms, digitalization of court systems, and evidence-based policymaking are essential prerequisites for developing credible and sustainable criminal justice systems. (Dr. Moh. Aris Siswanto, S.H., M.H. and Toheed Ahmad 2026)

Differences in Interpretation of Shariah

Although all OIC countries recognize Islam as an important source of legal and ethical guidance, significant differences exist regarding the interpretation and application of Sharia. These differences arise from diverse schools of Islamic jurisprudence, constitutional arrangements, historical experiences, and contemporary legal philosophies. Some jurisdictions adopt a textual approach emphasizing classical jurisprudential rulings, while others increasingly employ contextual and purposive methodologies based on Maqāṣid al-Sharī'ah. Consequently, criminal legislation concerning punishments, evidentiary standards, judicial discretion, and procedural safeguards may differ substantially among countries despite their shared religious foundations. Rather than treating these differences as obstacles, they should be viewed as evidence of the flexibility inherent within Islamic legal tradition. Comparative dialogue among scholars representing different schools of jurisprudence can facilitate the development of common ethical principles while respecting legitimate diversity in legal interpretation. Emphasizing universal Islamic values—including justice, mercy, public welfare, accountability, and human dignity—offers a practical foundation for harmonization without imposing uniform doctrinal interpretations. (Faheem Ullah Al Azhari and Sajid Iqbal Al Azhari 2025)

Opportunities for Reform through OIC Cooperation

Despite these challenges, substantial opportunities exist for strengthening criminal law harmonization through enhanced regional cooperation. The Organization of Islamic Cooperation possesses significant institutional capacity to facilitate comparative legal research, judicial dialogue, legislative cooperation, and knowledge sharing among member states. A coordinated OIC framework could encourage the development of model criminal law principles reflecting both Islamic ethical values and internationally recognized legal standards. Such principles would not replace national legislation but could serve as persuasive guidance for legislative reform, judicial interpretation, and legal education. Regional judicial academies, collaborative research centres, academic exchange programmes, and digital legal databases would further strengthen institutional capacity. Cooperation in combating cybercrime, money laundering, terrorism financing, human trafficking, environmental crimes, and corruption would also improve collective criminal justice responses to increasingly transnational forms of criminal activity. Furthermore, harmonization efforts should prioritize interdisciplinary research integrating criminal law, Islamic jurisprudence, economics, sociology, criminology, and legal education. Advances in digital technology, artificial intelligence, and comparative legal analytics provide new opportunities for evidence-based policymaking and judicial modernization. Ultimately, successful harmonization does not require identical criminal codes across OIC member states. Rather, it requires agreement on shared ethical principles, minimum procedural guarantees, respect for human dignity, effective crime prevention, and institutional

cooperation. By grounding criminal justice reform in the objectives of Sharia while embracing comparative legal innovation and international cooperation, OIC countries can develop criminal justice systems that are both culturally authentic and globally responsive. Such an approach offers the most promising pathway toward sustainable criminal law harmonization in the contemporary Islamic world. (Ibtisam Ali Khalfan Alhammadi, Mohamad Azrien Mohamed Adnan, and Yusmini Binti Md Yusoff 2026)

Toward an Integrated Harmonization Framework

The comparative analysis demonstrates that no single criminal justice model within the Organization of Islamic Cooperation (OIC) fully integrates Islamic ethics, economic justice, modern criminal law, and legal education into a coherent and sustainable framework. While Saudi Arabia emphasizes Islamic jurisprudence, Turkey adopts a predominantly secular legal system, and Pakistan, Malaysia, and Indonesia employ hybrid legal models. Jordan represents a statutory intermediate model with constitutionally limited Sharia jurisdiction, despite these institutional differences, all six jurisdictions pursue common objectives of justice, public welfare, crime prevention, and social stability. This convergence provides a strong foundation for developing an integrated framework capable of harmonizing criminal law without requiring legal uniformity. Accordingly, this study proposes the Integrated Criminal Law Harmonization Framework (ICLHF). The framework is founded on four mutually reinforcing pillars: Islamic Ethical Governance, Economic Justice Policies, Modern Criminal Law Reform, and Transformative Legal Education. Rather than functioning independently, these pillars operate as an interconnected governance system in which ethical values guide legislation, economic justice addresses structural causes of crime, legal reforms strengthen institutional effectiveness, and education ensures the long-term sustainability of criminal justice reforms. (Lailatul Nur Hasanah et al. 2025)

Islamic Ethical Governance

The first pillar establishes Islamic ethical governance as the normative foundation of criminal justice. Effective legal systems require more than procedural compliance; they must also command moral legitimacy by promoting justice, accountability, transparency, and respect for human dignity. Islamic legal philosophy provides this ethical foundation through the principles of **Maqāṣid al-Sharīʿah**, particularly the protection of religion, life, intellect, lineage, and property. Within this framework, justice (**ʿadl**) serves as the central organizing principle. Judicial decisions should be impartial, proportionate, evidence-based, and free from discrimination. The complementary values of **iḥsān** (benevolence), **amānah** (public trust), and **karāmah** (human dignity) require criminal justice institutions to balance accountability with compassion, rehabilitation, and procedural fairness. Consequently, law enforcement agencies, prosecutors, judges, correctional institutions, and policymakers should operate according to ethical standards that emphasize integrity, transparency, and service to society. Islamic ethical governance also supports constitutionalism and the rule of law by limiting arbitrary governmental power. Public officials remain accountable not only to statutory law but also to higher ethical obligations concerning justice and public welfare. Accordingly, ethical governance strengthens public confidence in criminal justice institutions while reinforcing institutional legitimacy. (Muhamad Zaenal Muttaqin et al. 2026)

Economic Justice Policies

The second pillar recognizes that criminal law alone cannot effectively reduce crime without addressing the socioeconomic conditions that contribute to criminal behaviour. Extensive criminological research demonstrates that poverty, unemployment, corruption, social exclusion, and unequal access to economic opportunities significantly increase criminal risk. Therefore, criminal justice should be integrated with broader economic policies that promote distributive justice and inclusive development. Islamic economic philosophy provides practical mechanisms for achieving this objective. Institutions such as **zakat**, **waqf**, charitable endowments, ethical finance, and the prohibition of **riba** encourage equitable wealth distribution while protecting vulnerable members of society. These mechanisms reduce structural inequalities that frequently underlie criminal activity, particularly property offences, financial crimes, and organized criminal networks. Within the proposed framework, economic justice extends beyond wealth redistribution. It also includes anti-corruption policies, employment generation, financial inclusion, access to quality education, social protection programmes, and responsible public governance. Investments in these areas reduce incentives for criminal behaviour while strengthening social cohesion and institutional trust. Accordingly, criminal justice policy should adopt a preventive orientation in which socioeconomic development complements traditional law enforcement. Such integration reflects both contemporary criminological theory and the preventive objectives of Islamic law. (Saleh Hashem Al-Farjani, Tanveer Ahmad, and Dr Hafiz Ahmed Saeed Rana 2025)

Modern Criminal Law Reform

The third pillar focuses on developing criminal justice systems capable of responding effectively to contemporary legal challenges while remaining consistent with Islamic ethical principles. Globalization, digitalization, artificial intelligence, cybercrime, financial fraud, environmental crime, terrorism financing, and transnational organized crime require continuous modernization of criminal legislation and judicial institutions. Modern criminal law reform should therefore incorporate several key principles. First, criminal legislation must satisfy the principle of legality by ensuring that offences and punishments are clearly defined. Second, proportionality should guide sentencing practices to ensure fairness and consistency. Third, procedural safeguards—including fair trial guarantees, judicial independence, legal representation, and due process—must be strengthened to protect individual rights and enhance institutional legitimacy. The framework also encourages wider adoption of restorative justice mechanisms where appropriate. Victim-offender mediation, community service, diversion programmes, rehabilitation initiatives, and restorative sentencing can complement conventional criminal sanctions while reducing recidivism and strengthening community reconciliation (Ehjelah et al., 2026). Digital transformation constitutes another important component of criminal law reform. Electronic court systems, digital evidence management, forensic technologies, artificial intelligence-assisted legal research, and secure judicial databases improve efficiency, transparency, and access to justice. However, technological innovation must remain subject to ethical oversight to protect privacy, prevent discrimination, and preserve judicial accountability. Thus, modern criminal law reform should combine legislative modernization, institutional efficiency, technological innovation, and ethical governance within a coherent legal framework. (Vicente Vias Da Costa et al. 2026)

Transformative Legal Education

The fourth pillar emphasizes the central role of legal education in sustaining criminal justice reform. Legislative changes alone cannot produce meaningful harmonization unless legal professionals possess the knowledge, ethical competence, and interdisciplinary skills necessary to implement reforms effectively. Transformative legal education requires substantial curricular reform within universities, judicial academies, police training institutions, and professional legal organizations. Criminal law education should integrate Islamic jurisprudence, constitutional law, comparative criminal law, criminology, forensic science, ethics, economics, international human rights law, and digital technologies. Continuous judicial education is equally essential. Judges, prosecutors, and law enforcement officers must receive regular professional training concerning cybercrime, financial crimes, artificial intelligence, international cooperation, digital evidence, environmental crimes, and emerging constitutional issues. Such programmes strengthen judicial competence while promoting consistent interpretation of criminal legislation. Public legal awareness also forms an important component of this pillar. Citizens who understand their legal rights and responsibilities are more likely to comply with the law, cooperate with criminal justice institutions, and resolve disputes peacefully. Consequently, legal literacy contributes directly to crime prevention and democratic governance. (Issa et al., 2023) Transformative legal education therefore creates the human capital necessary to implement ethical governance, modern legislation, and evidence-based criminal justice reforms across OIC member states. (Abdul Mustafa et al. 2025)

4. CONCLUSION

This study examined the harmonization of criminal law with Islamic ethics, economic justice, and legal education through a comparative analysis of selected Organization of Islamic Cooperation (OIC) countries, namely Pakistan, Malaysia, Indonesia, Saudi Arabia, and Turkey. The findings demonstrate that although these jurisdictions differ significantly in their constitutional structures, legal traditions, and approaches to criminal justice, they share fundamental commitments to justice, public welfare, accountability, and social stability. These shared values provide a strong normative foundation for developing a harmonized criminal justice framework that respects both Islamic ethical principles and contemporary legal standards.

The comparative analysis revealed that effective criminal justice cannot rely solely on punitive measures. Rather, sustainable criminal law reform requires an integrated approach that combines ethical governance, socioeconomic development, institutional modernization, and high-quality legal education. Islamic ethical principles, particularly those derived from the Maqāṣid al-Sharīʿah, offer a flexible and purposive framework for promoting justice, protecting human dignity, ensuring proportionality, and strengthening public trust in legal institutions. Similarly, Islamic economic mechanisms, including zakat, waqf, and ethical finance, contribute to addressing the structural causes of crime by reducing poverty, inequality, and social exclusion.

The principal contribution of this study is the proposed Integrated Criminal Law Harmonization Framework, which brings together four mutually reinforcing pillars: Islamic Ethical Governance, Economic Justice Policies, Modern Criminal Law Reform, and Transformative Legal Education. This framework demonstrates that criminal justice harmonization should not seek uniform legal codes but should instead establish common principles capable of accommodating constitutional diversity while promoting effective governance, procedural fairness, and institutional legitimacy.

Future research should empirically evaluate the implementation of this framework across a broader range of OIC member states, incorporating judicial practice, legislative reforms, and quantitative indicators of criminal justice performance. Such research would further strengthen comparative legal scholarship and support evidence-based policymaking aimed at developing criminal justice systems that are ethical, inclusive, resilient, and responsive to the evolving challenges of the twenty-first century.

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AUTHOR CONTRIBUTIONS

Lorem A. Ipsum: Conceptualization, Investigation.

Dolor B. Sit: Methodology, Laboratory Analysis.

Amet C. Consectetur: Data Curation, Formal Analysis.

Adipiscing D. Elit: Supervision, Writing—Review & Editing.

CONFLICT OF INTEREST

The authors declare that there is no conflict of interest.

ETHICS STATEMENT

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Ethical approval was not required for this study.

DATA AVAILABILITY STATEMENT

Lorem ipsum dolor sit amet, consectetur adipiscing elit. Data supporting the findings of this study are available from the corresponding author upon reasonable request.

REFERENCES

- [1] Abdul Kodir, Faquiddin, Nor Ismah, Samia Kotele, Wakhit Hasyim, and Fadzila Din. 2025. “Maqāṣid Cum-Mubādalah Methodology of KUPI: Centering Women’s Experiences in Islamic Law for Gender-Just Fiqh.” *AL-IHKAM: Jurnal Hukum & Pranata Sosial* 19(2): 519–45. doi:10.19105/al-lhkam.v19i2.16617.
- [2] Abdul Mustafa, Muhammad Ishaque, Rehan Raza, Samiullah, and Muhammad Irfan Raza. 2025. “When Culture Meets Fiqh: Examining the Legal Authority of ‘Urf in Contemporary Engagement Traditions.” *Global Islamic Research Journal* 1(1): 01–21. doi:10.65960/girj.1.1.2025.6.
- [3] Agustina, Arifah Millati, and Nor Ismah. 2024. “Challenging Traditional Islamic Authority: Indonesian Female Ulama and the Fatwa Against Forced Marriages.” *Journal of Islamic Law* 5(1): 125–46. doi:10.24260/jil.v5i1.2319.
- [4] Ahmad, Ishaq, and Shahida Aman. 2021. “Women’s Rights in Pakistan: A Study of Religious and Alternate Discourses Regarding Women’s Participation in Politics.” *Liberal Arts and Social Sciences International Journal (LASSIJ)* 5(1): 123–38. doi:10.47264/idea.lassij/5.1.9.
- [5] Ahmed Abdullah Muhammed Al Dhahli, Meshari Al Daihani, and Fadillah Bt Mansor. 2026. “The Future of International Commercial Arbitration in Islamic Jurisdictions: Harmonizing Global Standards with Sharia Principles.” *International Journal of Law and Social Sciences* 2(2): 48–68. doi:10.65960/ijlss.2.2.2026.17.

- [6] Akhtar, Jamil. 2024. "Waqf-Based Environmental Initiatives: Collaborative Partnerships With Government for Sustainable Development." In *Advances in Business Strategy and Competitive Advantage*, eds. Muhammad Shahbaz and Fakhar Shahzad. IGI Global, 177–206. doi:10.4018/979-8-3693-6265-5.ch009.
- [7] Akhtar, Jamil. 2026. "Reinterpreting Religious Authority: Women as Islamic Jurists for Addressing Gender Justice in Pakistan." *Women's Studies International Forum* 116: 103300. doi:10.1016/j.wsif.2026.103300.
- [8] Akram, Humayun, Khizar Hayat, and Wajid Ali. 2025. "The Interplay of Islamic Ideology and Political Authority in Pakistan's Constitutional Framework (1947-1988)." *Journal of Political Stability Archive* 3(2): 368–78. doi:10.63468/jpsa.3.2.21.
- [9] Al-Billeh, T., Hmaidan, R., Al-Hammouri, A., & Al Makhmari, M. (2024). The risks of using artificial intelligence on privacy and human rights: Unifying global standards. *Jurnal Media Hukum*, 31(2), 333–350. <https://doi.org/10.18196/jmh.v31i2.23480>.
- [10] Al-Billeh, T., & Issa, H. A. (2022). The community penalties in the Jordanian criminal law: What are the alternatives to liberty-depriving penalties? *Pakistan Journal of Criminology*, 14(3), 1–18.
- [11] Ali, Abdelhalim Mohamed Mansour, and Muhammad Ahmad Ibrahim Aljahsh. 2025. "The Proliferation of Anomalous Digital Fatwas: A Critical Examination of Jurisprudential Challenges and Societal Impacts in the Digital Age." *AHKAM: Jurnal Ilmu Syariah* 25(1): 37–52. doi:10.15408/ajis.v25i1.37905.
- [12] Aljadi, Soliman, Abdul Razak Mayhub, and Ali Ahmoudah. 2025. "Cultural Dynamics of Islamic Banking in Libya: Overcoming Regulatory Fragmentation and Enhancing Financial Literacy." *BANCO: Jurnal Manajemen dan Perbankan Syariah* 7(1): 30–51. doi:10.35905/banco.v7i1.12158.
- [13] AL-Khalaileh, Lana, Tareq Al-Billeh, and Majd Manasra. 2024. "The Legal Protection of Domain Names in Jordanian Legislation and the Rules of the Unified Domain Name Dispute Resolution Policy Issued by ICANN." *Jurnal Hukum Novelty* 15(1): 1. doi:10.26555/novelty.v15i1.a28132.
- [14] Alshible, M., Abu Issa, H., & Al-Billeh, T. (2023). The extent of considering environmental crimes as a manifestation of economic crimes. *Journal of Environmental Management and Tourism*, 14(1), 23–31. [https://doi.org/10.14505/jemt.v14.1\(65\).03](https://doi.org/10.14505/jemt.v14.1(65).03)
- [15] Andri Winjaya Laksana, Muhammad Ridwan Lubis, Denny Suwondo, Muhammad Ngazis, and Ratih Mega Puspa Sari. 2025. "Integrating Maqasid Al-Shari'ah in Contemporary Islamic Legal Reform on Drug Policy." *MILRev: Metro Islamic Law Review* 4(1): 416–39. doi:10.32332/milrev.v4i1.10665.
- [16] Arisa, Irna Nur, Meitika Privia, Dahniar Th. Musa, and Dwi Surti Junida. 2025. "WOMEN'S POLITICAL LEADERSHIP: AN ANALYSIS OF GENDER EQUALITY IN LEGISLATORS IN SEKADAU." *Jurnal Sosiologi Dialektika Sosial* 11(1): 87–98. doi:10.29103/jsds.v11i1.16522.
- [17] Azam, Muhammad. 2025. "THE TRANSFORMATION OF THE LETTER 'DHAD' BETWEEN SUPPORTERS AND OPPONENTS." *Open Access* 32.
- [18] Azam, Muhammad, Abdullah Abdul-Majeed Hamdoun, Eid Abed Alhaleem Maslat Harahsheh, Anis Mashdurohatun, and Hamonangan Parsaulian Sidaauruk. 2025. "Religious Diversity in the Digital Economy: Interfaith Legal Pathways to Harmonize Sharia, Christian Ethics, and International Law." *Contemporary Issues on Interfaith Law and Society* 4(2): 207–64. doi:10.15294/ciils.v4i2.33011.
- [19] Azam, Muhammad, Anis Mashdurohatun, Abd Ulahman Raad Nouri, and Salma Nur Hanifah. 2025. "The Implications of Trade Liberalization on Islamic Economic Ethics in Relation to the WTO Agreement Crisis on Organization of Islamic Countries." *International Journal of Environmental Sciences*: 2330–2440. doi:10.64252/015mam67.
- [20] Bagus Khusfi Satyo, S.H., M.Kn. and Bagus Agung Yuda Prasetyo, S.H., M.Kn. 2026. "Artificial Intelligence and the Future of Human Rights: Legal Accountability for Algorithmic Decision-Making in Democratic Societies." *International Journal of Law and Social Sciences* 2(1): 54–74. doi:10.65960/ijlss.2.1.2026.12.

- [21] Dr. Moh. Aris Siswanto, S.H., M.H. and Toheed Ahmad. 2026. "Climate Justice in Islamic Legal Thought: Harmonizing Environmental Law, Human Rights, and Sustainable Development in OIC Countries." *International Journal of Law and Social Sciences* 2(1): 20–41. doi:10.65960/ijlss.2.1.2026.14.
- [22] Ehjelah, Abdullah. 2025. "The Legislative Path of Alternatives to Custodial Penalties in Light of Amendments to the Jordanian Penal Code for 2017, 2022, and 2025: Social Reform" [Arabic]. *Yarmouk Research Journal, Human and Social Sciences Series* 34(1): 135–152.
- [23] Ehjelah, A., Obeidat, Y. M. G., Abu Issa, H., Aljazi, J. D., Alhujaili, S., & Kasassbeh, F. (2026). Administrative and judicial settlement in economic crimes under Jordanian law: Public asset recovery, deterrence, and legal certainty. *Journal of Economic Criminology*, 13, Article 100238. <https://doi.org/10.1016/j.jeconc.2026.100238>
- [24] Faheem Ullah Al Azhari and Sajid Iqbal Al Azhari. 2025. "Contemporary Challenges in Harmonizing Sharia, National Legal Systems, and International Law in a Rapidly Changing World." *International Journal of Law and Social Sciences* 1(1): 130–50. doi:10.65960/ijlss.1.1.2025.4.
- [25] Ibtesam Ali Khalfan Alhammadi, Mohamad Azrien Mohamed Adnan, and Yusmini Binti Md Yusoff. 2026. "Constitutional Protection of Religious Freedom in Muslim-Majority States: Comparative Lessons from Southeast Asia and the Middle East." *International Journal of Law and Social Sciences* 2(2): 22–47. doi:10.65960/ijlss.2.2.2026.18.
- [26] Issa, H. A., Kaddumi, T., & Alwerikat, N. (2023). The impact of moot courts on the quality of legal education: Students of the Faculty of Law at the Applied Science Private University as a model. *Journal of Higher Education Theory and Practice*, 23(19), 266–270. <https://doi.org/10.33423/jhetp.v23i19.6681>
- [27] Lailatul Nur Hasanah, Dr.Muhammad Shah Faisal, Zahoor Ahmed, and Mohamad Yusuf Ahmad Hasyim. 2025. "Religious Diversity and the Digital Economy: Legal–Academic Pathways to Harmonize Sharia and International Law." *International Journal of Law and Social Sciences* 1(1): 01–40. doi:10.65960/ijlss.1.1.2025.8.
- [28] Muhamad Zaenal Muttaqin, Ahmad Ibrizul Izzi, Reza Fauzi Nazar, Shohibul Wafa Tadzul Arifin, and Muhamad Yogi Sandra. 2026. "Family Harmony in Contemporary Islamic Law: Ibn ‘Āshūr’s *Maqāṣid* Perspective on Marital Rights and Duties." *MILRev: Metro Islamic Law Review* 5(1): 61–79. doi:10.32332/milrev.v5i1.10480.
- [29] Muhammad Azam, Anis Mashdurohatun, Angga Nugraha Firmansyah, Muhammad Dias Saktiawan, and King On Putra Jaya. 2025. "Harmonizing Contemporary International Commercial Law with Sharia-Based National Legal Systems: A Comparative Study of Pakistan, Turkey, Indonesia, Malaysia, and Saudi Arabia." *MILRev: Metro Islamic Law Review* 4(2): 1074–96. doi:10.32332/milrev.v4i2.11334.
- [30] Muhammad Azam, Naji Mohammad Alwreikat, Burhan Alsyouf, Abdel Salam Atwa Ali Al Fandi, and Rawdah Abdul Karim Mohammad Pharaon. 2026. "Contemporary Trade Governance and Cross-Border Data Flows: A Comparative Study of Shari‘ah Principles and International Legal Frameworks." *MILRev: Metro Islamic Law Review* 5(1): 686–721. doi:10.32332/milrev.v5i1.13387.
- [31] Muhammad Azam, Rawdah Abdul Karim Mohammad Pharaon, Elsoghair Mahdy, Manal Abdellatif Issa Albabili, Burhan Alsyouf, and Bagdat Bagayev. 2026. "AI-Driven Sharia Governance in Islamic Digital Payment Systems: Developing a Contemporary Islamic Law Framework for Ethical and Regulatory Compliance." *Nusantara: Journal of Law Studies* 5(2): 849–80. doi:10.66325/nusantaralaw.v5i2.339.
- [32] Oseni, Assayouti, Ismail, and Ogunwolu Adio Sulaimon. 2026. "Digital Surveillance and Human Dignity (Hifz al-‘Irḍ): An Islamic Ethical Appraisal with Reflections from Nigeria." *International Journal of Research and Innovation in Social Science* 10(2): 4652–65. doi:10.47772/IJRISS.2026.10200341.
- [33] Purnomo, H., Baharudin, & Khater, M. N. (2025). The return of state finances: Effectiveness of the new paradigm in enforcing of law on corruption crimes cases. *Jurnal Hukum Unissula*, 41(4), 1078–1092. <https://doi.org/10.30659/jh.v41i4.47218>

- [34] Saleh Hashem Al-Farjani, Tanveer Ahmad, and Dr Hafiz Ahmed Saeed Rana. 2025. "Digital Innovation, Legal Reform, and Social Justice: Interdisciplinary Approaches to Law, Technology, and Human Rights." *International Journal of Law and Social Sciences* 1(1): 91–129. doi:10.65960/ijlss.1.1.2025.5.
- [35] Samara, Abdallah. 2024. "Impediments to the Implementation of Criminal Penalties in Sharia and Law: A Comparative Study." *Jordan Journal of Islamic Studies* 20(1): 161–195. doi:10.59759/jjis.v20i1.375.
- [36] Vicente Vias Da Costa, Carlito Da Costa, Roberto Jeronimo Cristovao, Carolina Da Cruz, and Felix Cristovão Pinto. 2026. "Reconstruction of Regulation for Corruption Eradication Commission Officers Involved in Corruption Cases Base on Justice Values." *International Journal of Law and Social Sciences* 2(1). doi:10.65960/ijlss.2.1.2026.10.