

# LAW MAJALLA

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LEGACY IN WORDS : ARTICLE WRITING COMPETITION

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SPECIAL EDITION

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**AN ODE TO LEGACY: ALMARHUM PROF. AHMAD IBRAHIM**  
*MUHAMAD DANISH ZUHDI BIN MOHD ZUHRI*

**ACCESSION OF GLORY**  
*AZIZAH SARA BINTI ABDUL AZIZ*

**PIONEER OF HARMONISATION BETWEEN CIVIL AND ISLAMIC LAW: ONE IN THOUSANDS**  
*SHAZWANI NAJIHA SAUMMI BINTI NAJMUDDIN*



Compilation of Winning Entries

Legacy in Words: Article Writing Competition

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*Ahmad Ibrahim Legacy Week 2025*

*IIUM Law Students' Society x IIUM Law Majalla*



# AN ODE TO LEGACY: ALMARHUM PROF. AHMAD IBRAHIM

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## INTRODUCTION

Almarhum Professor Emeritus Tan Sri Datuk Ahmad bin Mohamed Ibrahim (referred to as Prof. Ahmad Ibrahim) is a distinguished figure in the field of law. Champion of both the civil and *Shariah*. He is renowned and recognized for the contributions to implement Islamic law alongside civil law in Malaysia.<sup>2</sup> The first time I've heard of the name, "Ahmad bin Mohamed Ibrahim" was in my form 5 textbook for 'Pendidikan Agama Islam.' Where his contributions at that time were mentioned to be amongst the great figures of Islam (alongside Salahuddin al-Ayyubi and Hassan al-Banna).<sup>3</sup> At that moment, I did not realise how huge of an effect he brought to the vast field of law, ranging from Islamic Law to Constitutional, upholding rights of woman and children etc.

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<sup>2</sup> Khairudin Aljunied, *Shapers of Islam in Southeast Asia: Muslim Intellectuals and The Making of Islamic Reformism*, 1st ed. (New York: Oxford University Press, 2022), 12, <https://academic.oup.com/book/44507>.

<sup>3</sup> Mohd Tajuddin Jamaluddin et al., *Buku Teks Pendidikan Agama Islam Tingkatan 5*, 1st ed. (Kuala Lumpur: Dewan Bahasa dan Pustaka, 2020), 177-182, <https://online.anyflip.com/wdfm/zrhg/mobile/index.html>.

*Ta'aruf* (orientation) week in IIUM helped me to see that his works went beyond the books he wrote. Rather, it is the everlasting impact that he has on others, as a teacher, a lawyer and an office man. He left a trail of a great man during his lifetime, until his passing in 1999. In undertaking this journey to honour his legacy, I will examine different significant events at distinct phases of his life which I divided into three (i.e. early days of practicing, life as a legal statesman and life as an academician) where I will provide my own comments and remark over each incident that has occurred from the materials that I have found to the best of my understanding.

## SIGNIFICANT EVENTS

I believe that in order to demonstrate and showcase his excellent contributions in the field of law, it is essential to discuss and divide certain period in his lifetime where I think his attributes shines the most. Therefore, I differentiate each timeline by writing about his early days of practicing, life as a legal statesman and life as an academician.

### Early days of practicing

On the 16<sup>th</sup> of September 1946, he was called to the Bar in Singapore where he was the first advocator and solicitor when the British return to Singapore.<sup>4</sup> From 1949 to 1955, he worked at private legal firm in which during this time, he encountered a huge obstacle in his career. In 1950, the tragedy

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<sup>4</sup> Ahmad Nabil Amir, "Ahmad Ibrahim and the Islamization of law in Malaysia," *Advances*, August 17, 2023, 85, <https://doi.org/10.11648/j.advances.20230403.12>.

of Natrah unfolded whereby Prof. Ahmad Ibrahim represented Natrah (Maria Huberdina Hertogh) in determining the rights of guardianship of her falls to whom, whether to Che Aminah or her parents and regarding the validity of her marriage to Inche Mansoor Adabi.<sup>5</sup> Following the appeal on 3<sup>rd</sup> of August 1951, Prof. Ahmad Ibrahim and his colleague represented both Natrah and Mansoor again on the same issues.<sup>6</sup> However both of these cases resulted in the invalidity of the marriage between them and Natrah was returned to Holland whereby the court held the rights of guardianship falls to her parents, the Hertogh family.

This case was such a heated moment, whereby many aspects clashed between each other (i.e. local norms against Western cultures, Islamic laws against English laws, colonial power against the colonised etc.).<sup>7</sup> Riots broke out causing casualties, Muslims rally to protect Natrah from being returned back home and to preserve the sanctity of Islam.<sup>8</sup> This was a wake-up call for great figures in that time including Prof. Ahmad Ibrahim, where he saw that legal reforms especially in Islamic

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<sup>5</sup> Mohd Hariri Haji Mohamad Daud, [Ustaz 3 Beradik]. *Sejarah Natrah dan Undang-Undang Keluarga Islam*. May 12, 2020, educational video, 2:10, <https://youtu.be/NawWrJPtRGM?si=atea8FFdgUMSnLI7>.

<sup>6</sup> In Re Maria Huberdina Hertogh; Adrianus Petrus Hertogh and Anor v Amina Binte Mohamed and Ors [1951] 1 MLJ 12.

<sup>7</sup> Mohd Hariri Haji Mohamad Daud, [Ustaz 3 Beradik]. *Sejarah Natrah dan Undang-Undang Keluarga Islam*. May 12, 2020, educational video, 2:10, <https://youtu.be/NawWrJPtRGM?si=atea8FFdgUMSnLI7>.

<sup>8</sup> *Days of Rage: S1 – Nadra*, directed by Joan Chee (CNA, Aug 2, 2019), 39:10, <https://www.channelnewsasia.com/watch/days-rage/nadra-1503361>.

law was crucial to uphold the rights of Muslims and to avoid such chaos from occurring again in the future.<sup>9</sup> It caused a domino effect that brought the importance of institutionalizing Islamic law from Singapore to Malaysia.

During my research about this case, I came across one of Prof. Ahmad Ibrahim's view on the exceptional weight that Islamic Law carried that may alter the outcome of this case. He quoted the case of *Natrah* (Maria Hertogh), where he said that he had seen the impact that English family law brought to the decision of the case, that it ignored the welfare of custody of the child. Coming across saying that since then justice has gradually moved to the underlying principles of Islam.<sup>10</sup> I wanted to showcase the obvious effect it leaves for Prof. Ahmad Ibrahim. The impact of which I assume resulted in influencing his first work to be Family Law in Malaya and the last of *Undang-Undang Keluarga Islam di Malaysia* to be written by him, meaning this case never left Prof. Ahmad Ibrahim throughout his life.

### **Life as a legal statesman**

In 1959, Prof. Ahmad Ibrahim became the first State Advocate-General until 1963 after an independent Singaporean government was formed. As State advocate-general, he led four prominent Muslim groups in that time

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<sup>9</sup> Nurul Haziqah Abdul Halim, "*The Natrah Riots United The Malays To Uphold Islam*", UKM News, June 2, 2014, <https://www.ukm.my/news/archive/tahun-2014/june-2014/the-natrah-riots-united-the-malays-to-uphold-islam/>.

<sup>10</sup> Amir, "Ahmad Ibrahim and the Islamization of Law in Malaysia," 85.

proposing the necessity for a systematic Muslim body to form a liaison committee, in hopes to centralize the administration of Muslim matters in Singapore. He then drafted and proposed the Administration of Muslim Law Bill that was introduced in legislative assembly in 1960, and Administration of Muslim Law Act (AMLA) was passed in Parliament in 1966.<sup>11</sup> In the same year, he was appointed as the first State's Attorney General from Singapore's independence.<sup>12</sup>

AMLA was vital in the centralization in the application of Islamic law and values as it is the foundation for the establishment of Majlis Ugama Islam Singapura (MUIS) and a general reference concerning all Muslims interests and rights in Singapore (e.g. property, marriage and divorce, finance etc.).<sup>13</sup> Prior to AMLA, Muslims in Singapore are governed under The Muslims Ordinance 1957 by hopes to establish an Islamic court of law in Singapore. AMLA, replaced the previous ordinance of 1957, strengthening the *Shariah* Court and create a unified Muslim authority. Not only that, but he was also involved in the merger talks between Singapore and

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<sup>11</sup> The National Library and Archives Board. Administration of Muslim Law Act 1966 (Singapore: nlb, n.d.) <https://www.nlb.gov.sg/main/article-detail?cmsuuiid=c5f54cb7-86c4-4e0a-a518-3e2bd8e234ad>.

<sup>12</sup> Amir, "Ahmad Ibrahim and the Islamization of Law in Malaysia," 86.

<sup>13</sup> Administration of Muslim Law Act 1966.

Malaysia until it's separation in the 1960's.<sup>14</sup> He also held different positions after 1967,<sup>15</sup> until his retirement in 1968.

To observe the impact of the work he had done during this time, I feel obliged to add that Prof. Ahmad Ibrahim also drafted the Women's Charter 1961 in Singapore. This charter generally works to preserve and maintain the rights of women and children since they face inequalities prior to the enforcement of this charter. In the late 1950's, women's face discrimination in terms of lesser payment, lesser work opportunities and fully dependent on their husbands for financial support.<sup>16</sup> These two laws, heavily contributed by Prof. Ahmad Ibrahim in his career proves his number of attempts to build a just legal environment in Singapore for the minorities and the ones treated unfairly in society. Not disregarding the unfortunate while maintaining a significant role in Singapore's history is a commendable character of Prof. Ahmad Ibrahim.

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<sup>14</sup> *Hero: Ahmad Mohamed Ibrahim*, published by Mohd Aliff Mohd Nor. 2013. RTM2. uploaded by Umran Videos. Youtube. *A Short Documentary On Tan Sri Prof Ahmad Ibrahim*. Oct 8, 2014. <https://youtu.be/OMptuWqpUKE?si=4J-XxUhUrsY44S3A>.

<sup>15</sup> State Plenipotentiary (Ambassador) to United Arab Republic and legal advisor to the Finance Minister of that time.

<sup>16</sup> APLaws, "The Unforgettable One - Tan Sri Dato' Prof Ahmad Bin Mohamed Ibrahim."

## **Life as an academician**

After 22 years in civil service, he ultimately decided to move to Malaysia in 1969. From 1969 – 1972, he served as a Professor in Law in the Faculty of Economy and Administration at University Malaya (UM). He later proposed for an independent law faculty in Malaysia<sup>17</sup> which led to the first law faculty in the country to be formed. Prof. Ahmad Ibrahim served in University Malaya as the first Dean of the faculty and Vice Chancellor from 1972 to 1983. Then in 1983, he was one of the founding fathers of the Kulliyah of Laws,<sup>18</sup> one of the first two Kulliyah established (next to Kulliyah of Economics) from the formation of International Islamic University Malaysia (IIUM). He was appointed as Syeikh al-Kulliyah, the Dean of the Kulliyah of Laws, leading its administration until 1999. Up to this point, he held various positions of administration in the university<sup>19</sup> until his passing on 17<sup>th</sup> April 1999.

Around this period of his life, he had hugely contributed to the systematic implementation and institutionalization of Islamic Law in many ways<sup>20</sup> in Malaysia including constitutional

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<sup>17</sup> Malaysia depended on other law faculties in other countries (e.g. Singapore and England).

<sup>18</sup> In 2000, its name was changed to Ahmad Ibrahim Kulliyah of Laws (AIKOL) in honour of the late Prof. Ahmad Ibrahim.

<sup>19</sup> Deputy Rector, Board of Directors and Members of Senate.

<sup>20</sup> Published 'Jurnal Hukum' for the development of Islamic Law, proposed the restructuring of *Shariah* Courts hierarchy system, contribution to Islamic Banking etc.

reform to the Constitution. Prof. Ahmad Ibrahim is the architect of Article 121 of the Federal Constitution amendment by adding the clause (1A) to strengthen the position of *Shariah* Courts and remove the jurisdiction of Civil Court over matters concerning *Shariah* Courts. He proposed the idea to the then Prime Minister, Tun Dr. Mahathir bin Mohamad to be presented in the parliament and it was passed in 1988. He also presented argument on numerous occasions regarding the wording of our constitution and statutes, for example to highlight the usage of Islamic Law<sup>21</sup> and to demolish the previous influence of English Common Law in Malaysia.<sup>22</sup>

I believe this is the tip of the iceberg of what Prof. Ahmad Ibrahim has accomplished in this time. He had left a huge mark in the legal history of Malaysia that it is difficult to pinpoint certain parts to use as a measure of his greatness. For me, the two that I have mentioned in this article have contributed to his remarkable legacy in many ways. First, the establishment of the faculty of law of UM and IIUM has produced a staggering number of graduates in the field of law. Becoming lawyers, honourable judges and even figures that shape our country's administration. Second, the amendment of Article 121 (1A) of the Federal Constitution is a fundamental breakthrough in regard to the exclusive jurisdiction of the *Shariah* Courts. It is undeniable that there is still room for improvements, but this is Prof. Ahmad Ibrahim's attempt to

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<sup>21</sup> Art. 160 also includes Islamic Law based on the term "custom or usage with the force of law" but it's not exclusive to the laws mentioned in the Federal Constitution.

<sup>22</sup> The absence of statutes of general application in Section 3(1)(a) of the Civil Law Act makes English Law statutes not applicable in West Malaysia.

return the superiority of *Shariah* Courts from the consequences of being colonized by the British.

## CONCLUSION

In my journey to appreciate Prof. Ahmad Ibrahim's lifetime full of contributions and decorated awards, I have stumbled upon interesting facts about the man himself. Not only his story becomes much clearer, but I understood it better by reading the efforts of scholars to grasp the ideas of Prof. Ahmad Ibrahim. Needless to say, his story and mission did not end with his passing. The works he has propounded, the ideas he gathered for the betterment of society must be continued for it to reach its full potential. Darren Hardy<sup>23</sup> sums up the idea of leaving behind a legacy:

*“A legacy is a story to be lived, not a tale to be told.”*

As students in the field of law, we should idealise Prof. Ahmad Ibrahim's commitment to his craft, to excel in our studies and have the ultimate goal of serving the public in the principle of natural justice, exercising the best of our capabilities to amend and interpret the law which suits the best interests of the community. Roscoe Pound describes it best:

*“The law serves as a tool for social engineering, to maximize the fulfillment of interest of the community and provide smooth running of the machinery of society.”*

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<sup>23</sup> Darren Hardy is an American author, keynote speaker, advisor and former publisher of SUCCESS magazine.

As Muslims, we should remember that seeking knowledge is for the sole purpose of pleasuring Allah and attaining the ultimate *taqwa*. Additionally, contributing to alleviate the burden of people around us. This is shown by the lifelong efforts of Prof. Ahmad Ibrahim to create an environment for Islamic Law and Common Law to prosper together, for the Muslim and non-Muslims community to live harmoniously. Jabir reported that the messenger for Allah, peace and blessings upon him, said:

*“The believer is friendly and befriended, for there is no goodness in one who is neither friendly nor befriended. The best of people are those who are most beneficial to people”*<sup>24</sup>

As Malaysians, we ought to preserve our identity and culture. In Prof. Ahmad Ibrahim’s fight to establish a law in Malaysia independent from other influences, he showcased the significance for national roots to be free and sovereign to exercise its own will. Without calling to such matters, we will lose hold of our own pride and togetherness to thrive for progress of our nation. Tunku Abdul Rahman demonstrates this message by stating:

*“We are all Malaysians. This is the bond that unites us. Let us always remember that unity is our fundamental strength as a people and as a nation.”*

I’ll end by stating that in the hopes of creating another Prof. Ahmad Ibrahim, it is the harsh truth that it requires an unwavering commitment to studies and a countless time of

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<sup>24</sup> al-Mu’jam al-Awsaṭ lil-Ṭabarānī 5937, Hasan (fair) according to Al-Albani.

perseverance. At the end of the day, it is never guaranteed that we may become like him. However, the efforts, time spent to improve and the desire to contribute is what truly makes another person the successor to his story. Contribute, big and many or little and small or vice versa is not what counts, but the boundless positive impact that it leaves is the true mark of a great figure.

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## ACCESSION OF GLORY

Azizah Sara Abdul Aziz<sup>1</sup>

Freedom: a selective illusion, a poverty unbeknownst to uncivilised men.

Malaysia serves no more than a name that rings a thunder of bells in the name of history. Cultured but bleached, glorious yet ceased. In the name of God, Malay states have kept religion close, staying rigid to what's taught, staying true to Islamic teachings and rulings. Nonetheless, the winners hold the power to write how history unfolds, in the midst of twist and turns what was never truly erased is the divine sources and faith of mankind. What's once lost, rewritten and strengthen, being the plinth of what connects us to our roots, no more than the effort put in by a simple figure. He was only ever a man of faith and resilience before he was known, before he was the great Professor Emeritus Tan Sri Ahmad bin Mohamed Ibrahim - the founder, the reformer, the plinth of holistic legal education.

“The Constitution of Malaysia must be interpreted in the light of our history and traditions, and not merely according to English constitutional doctrines.” - Ahmad Ibrahim in “The Malaysian Constitution.” His work forged the intellectual and institutional foundations of Malaysia's post-colonial legal identity. Through his insistence on contextual constitutional

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interpretation, his contributions to Islamic law reform, his touch on legal pluralism, and his pioneering role in legal education, he shaped Malaysia's legal landscape in profound and lasting ways. The vision of a harmonious dual legal system, one that respects both Malaysia's Islamic identity and its multicultural social fabric and it remains the guiding framework for Malaysian law till this day. What could possibly define a nation better than its base and blueprint, what could possibly mean more than the strength and willingness to restructure the legal system, to not fully erase history, but to patch up the wound made by reinforcing what's taken away and lost.

Heritage and historical culture fade within generations, but the human nature of us civilians long for a sense of self, a sense of identity, a need for connection and interlinks with what people of our race practiced, of what's meant to be preserved. "Islamic law in Malaysia is not foreign law. It is the law of the land for the Muslims"- Malayan Law Journal 1985. Prof. Ahmad Ibrahim played a foundational role in strengthening Malaysia's legal identity through the systematic development of Islamic law. As the principal architect of the modern Islamic legal system, he was instrumental in drafting and restructuring state Islamic enactments, enhancing the jurisdiction and procedural clarity of the *Shariah* Courts, and contributing significantly to the formulation of Administration of Islamic Law enactments across multiple states. His work also established the contemporary hierarchy of the *Shariah* judiciary, including the *Shariah* High Court and the *Shariah* Court of Appeal, which provided institutional coherence and elevated the status of Islamic adjudication. Collectively, these reforms helped shape Malaysia's national identity by reinforcing the position of Islamic law as an integral

component of the country's legal heritage and affirming its role in guiding Muslim personal and family law. It gave reassurance to the people of strong belief, it gave meaning to more than what is measured of the worldly materialists.

Education is what provides privilege, education is where structure and fairness is gained, argued to be made rightful to all. Ahmad Ibrahim shaped Malaysia's national identity through his transformative reforms in legal education as the founder of the Faculty of Law in University of Malaya, designing the country's first modern law curriculum, emphasising Malaysian statutory and case law, the centrality of the Federal Constitution, and the incorporation of Islamic legal principles. He visualises the legal education as a platform that would reflect the nation's own legal character rather than merely replicate the colonial models. He gave an opportunity to the youngsters, the people of this land to learn, to hold the pen and rewrite the truth of our own land, to practice and immerse. His impact deepened with the establishment of the Ahmad Ibrahim Kulliyah of Laws (AIKOL) at the International Islamic University Malaysia, where he pioneered an integrated curriculum that brought together common law, Islamic law, and comparative legal studies in a coherent and systematic framework. Through these institutions, Prof. Ahmad Ibrahim trained generations of lawyers, judges, and scholars who would later shape Malaysia's legal landscape, thereby institutionalising the country's distinctive dual legal identity that harmonises civil and Islamic traditions. AIKOL remains a place where *Shariah* education is emphasized, birthing people of genuine and professional knowledge of Islamic law.

Prof. Ahmad Ibrahim's influence extended far beyond the courtroom and the university as it reached into the very architecture of Malaysia's national laws. As one of the most respected legal minds of his generation, he played a pivotal role in drafting and shaping several cornerstone pieces of legislation that continues to define Malaysia's legal identity till this day. His contributions to the National Land Code 1965 helped solidify a coherent, modern land administration system suited to a post-colonial nation striving to establish legal independence from English common law. At the same time, his deep expertise in Islamic jurisprudence enabled him to craft and refine the Islamic Family Law enactments and the *Shariah* Criminal Offences laws across various states—legal instruments that became foundational in articulating a Malaysian expression of Islamic governance. His reformist spirit also extended to the evolving fields of Islamic banking, *waqf* administration, and *zakat* regulation, where his guidance ensured that these systems could operate within a sophisticated, statute-based framework compatible with both *Shariah* principles and contemporary national needs. Collectively, these legislative interventions did more than fill gaps in the law, they helped Malaysia transition from inherited colonial structures to a legal landscape that authentically reflects its multicultural foundations and its deeply rooted Islamic character.

Globally, Malaysia is renowned as the land of peace and harmony within several distinctions and Prof. Ahmad Ibrahim emerged as one of the most persuasive voices calling for harmony between Malaysia's two great legal traditions, civil law and Islamic law at a time when the nation was still searching for understanding of its post-colonial identity. Through his prolific writings and tireless advocacy, he argued

that these systems were not destined to stand in opposition but could, if guided with intellectual integrity and historical sensitivity, evolve into a coherent and mutually reinforcing framework. He challenged the assumption that English common law should dominate unquestioned, insisting instead that Islamic law, as been long embedded in the social and cultural fabric of the Malay states and world, must be recognised as part of Malaysia's living law. His work confronted jurisdictional tensions, urged clarity between civil and *Shariah* courts, and offered principled models for resolving conflicts without diminishing the authority of either system. By articulating a vision in which both legal traditions could flourish side by side, Ahmad Ibrahim laid the intellectual groundwork for later reforms in constitutional interpretation, family law, financial regulation, and judicial structure. In doing so, he strengthened not only the legal system but also the nation's sense of itself, shaping a uniquely Malaysian identity grounded in a dignified coexistence of common law heritage and Islamic legal civilisation.

Prof. Ahmad Ibrahim's scholarship stands as one of the most enduring intellectual forces behind Malaysia's legal identity, rooted in his conviction that Islamic law was not an imported system, but an indigenous tradition woven into the historical fabric of the Malay Peninsula. Rejecting the colonial-era hierarchy that treated Islamic law as inferior to the common law, he asserted in his influential 1985 *Malayan Law Journal* article that "Islamic law in Malaysia is not foreign law. It is the law of the land for the Muslims and has always been part of the Malaysian legal system." This principle became the cornerstone of his lifelong mission to restore the dignity and authority of the *Shariah* courts, a vision he advanced in the drafting of the Administration of Islamic Law enactments

across numerous states, which formally shaped the powers of religious councils, fatwa committees, and the hierarchy of the *Shariah* Subordinate Courts, High Courts, and Courts of Appeal.

Anchoring his argument in the constitutional position of Islam under Article 3 of the Federal Constitution that states “Islam is the religion of the Federation; but other religions may be practised in peace and harmony in any part of the Federation,” his constitutional philosophy deepened this project to the calling for a Malaysian-centred legal hermeneutic shaped future, debating on the harmonisation of civil and *Shariah* jurisdictions, the place of Malay customs, and the resolution of conflicts between civil and Islamic law. At the same time, Prof. Ahmad Ibrahim embraced Malaysia’s plural society acknowledging that while Islam occupies a special constitutional position, legal development must also protect the legitimate expectations of non-Muslim communities. As he stated in his 1991 work, *Legal Pluralism in Malaysia*, “Malaysia is a plural society and its laws must reflect the legitimate expectations of all its communities, while giving Islam the special position accorded by the Constitution.” This balanced perspective influenced reforms in non-Muslim family law, jurisdictional boundaries, and the coexistence of Islamic, *adat*, and civil legal traditions.

In the decades following independence, Malaysia undoubtedly faced the critical task of defining a national legal identity, deemed to have been tainted, stained by the mix and losses through generations. In occurrence to the inheritance of the English common law system and the practice of Islam as the religion of the Federation, a hybrid legal structure is bound to be emerged. Through Ahmad Ibrahim’s legislative drafting,

influential academic writings, and foundational role in Malaysia's legal institutions, he provided the intellectual and structural framework that continues to shape Malaysian law today, the law that governs our land, the law that holds two and two together, the law that makes Malaysia a land of cultured harmony.

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## PIONEER OF HARMONISATION BETWEEN CIVIL AND ISLAMIC LAW: ONE IN THOUSANDS

Shazwani Najiha Saummi Binti Najmuddin<sup>1</sup>

This article is written as a tribute in reminiscence of Al-Marhum Professor Tan Sri Datuk Ahmad Mohamed Ibrahim, a figure who has paved the way for a brighter future where Islamic Law may thrive and become on par with civil law in not only Malaysia, but also Singapore and Brunei, which will become a fiery torch that will become *qudwah hasannah* for other countries to follow suit. I will explain qualities that I have taken as inspiration after reading through his journey in hopes that it will light up our spirits again and make us realise the real reason why we are granted the chance of studying at Ahmad Ibrahim Kuliyyah of Laws (AIKOL) in the first place.

First and foremost, Professor Ahmad's determination in gaining knowledge, experience and making an impact in the legal expertise. From an extraordinary background of Raffles College to receiving first class in Economics Tripos I and Law Tripos II while studying at St John's College in Cambridge University after receiving the Queen's scholarship, his education was never on the shorter end of the stick.<sup>2</sup> His career

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<sup>2</sup> "Al-Marhum Professor Tan Sri Datuk Ahmad Mohamed Ibrahim," iium.edu.my, 2024, <https://memorial-lecture.iium.edu.my/ahmadibrahim/professor-tan-sri-datuk-ahmad-mohamed-ibrahim/>.

took off after finishing his studies, starting of as the first state advocate general in 1959 and continued to become the first Singapore Attorney General after its independence.<sup>3</sup> His achievements were levelled with the positions he acquired, such as becoming a key person of merger talks between Singapore and Kuala Lumpur and drafting the Administration of Muslim Law Bill in Singapore as a headstart for the administration of Islamic law in the state. His journey did not stop there, as he later became a lecturer in University of Malaya as well as International Islamic University, Malaysia. His life cruise reflected his burning interest for knowledge and experience in the legal department.

His resolution did not go unnoticed, as even Former Singapore Finance Minister, Dr. Goh Keng Swee, described Ahmad Ibrahim as someone with a very high and broad intellect and his ability as a legal drafter was unmatched.<sup>4</sup> On top of that, Malaysian Institute of Islamic Understanding (IKIM) has undertaken another effort to acknowledge the various roles played and learned contributions made by Prof. Ahmad Ibrahim by initiating a project to write his biography in 2022 in order to record a comprehensive study on Ahmad Ibrahim's character, thought and contribution, better assert Ahmad

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<sup>3</sup> Vernon Cornelius and Mohamad Tauhid Mohd Bakhtit. "Ahmad Bin Mohamed Ibrahim." Nlb.gov.sg, 2024.  
<https://www.nlb.gov.sg/main/article-detail?cmsuuid=aa60d648-d989-4a4b-96fa-5f983d90b6fc>.

<sup>4</sup> Mohammad Hariz Shah Mohammad Hazim Shah and Ahmad Hidayat Buang, "Ahmad Ibrahim Dan Sumbangannya Dalam Perkembangan Islam Di Malaysia," *Journal of Al-Tamaddun* 16, no. 1 (June 29, 2021): 81–98, <https://doi.org/10.22452/jat.vol16no1.6>.

Ibrahim's position in the world of academia, identify Ahmad Ibrahim's unaccomplished ideas and a lot more.<sup>5</sup> If the biography was successfully published, it shall become a legendary guidance and milestones for today's generation to refer to and worked towards. For instance, in volume 20 of *Journal of Malaysian and Comparative Law*, Professor Ahmad Ibrahim has once set his heart on establishing Federal *Shariah* Court while writing his article 'The future of *Shariah* and *Shariah* Courts in Malaysia.'<sup>6</sup>

Moving on, his efforts in the legal research was also not lacking one bit. One of the qualities that really made me believe his goal to harmonise between the civil and Islamic law is not only through his mastery over both education, but also the mastery of Quran which he does not think twice to insert Quranic verses in articles that he has written. For example, in *Malaysian Law Journal*, where he talks about 'Offences Against Women- Are there adequate safeguards', Professor Ahmad managed to insert verse 10:47, which was on one will be punished justly. This insertion really relates to me, as a first-year student studying Islamic Legal System subject where an objective of the Islamic law is punishment both in the *dunya* (wordly life) and *akhirah* (hereafter). This may seem as if it is a small thing in other people's eyes, but I

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<sup>5</sup> Wan Azhar, "'Ahmad Ibrahim: A Biographical and Intellectual Study.'" Laman Web Rasmi IKIM. November 2006.

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<sup>6</sup> Ahmad Ibrahim, "The Future Of The Shariah And The Shariah Courts In Malaysia," *Journal of Malaysian and Comparative Law* 20, no. 1 (1993): 41–58,

<https://borneojournal.um.edu.my/index.php/JMCL/article/view/16072>.

believe that it really pictures his character as someone who truly wants to reinforce the status of Islamic Law without needing to read through his achievements. If I were to add, it is the hadith that translates, “I have left you with two matters, you will never go astray as long as you hold fast to them: the Book of Allah (Qur'an) and the Sunnah of His Prophet” where I imagined it is a hadith Professor Ahmad held onto.

Lastly, being someone who is adverse in legal department, Professor Ahmad was also outperforming his duties as a legal practitioner. A case where he represented the defendant in the case of *In Re Maria Huberdina Hertogh* (1950) which was about a Dutch child that was taken care and raised as a Muslim by a Muslim woman, Aminah binti Mohamed during World War II.<sup>7</sup> Later, the biological parents of the Dutch girl wanted to take the custody of the child. The court held that the child was to be returned to the biological parents as Aminah had no legal adoption under the civil law. Prof. Ahmad Ibrahim was a counsel to Aminah at the time. It was a well-known case down the line not only because of the Maria Hertogh riots that happened after the Muslim community found a picture of the child in convent, but it was also one of the earliest case that represents the clash between legal colonial case and Muslim personal law.<sup>8</sup> Although he was unsuccessful in this case, this case later became an influence to reform the Muslim law in Singapore and Malaysia. In my humble opinion, the

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<sup>7</sup> “Re M. H. Hertogh, an Infant: *Hertogh v. Amina Binte Mohamed and Others.*” *The International Law Quarterly* 4, no. 2 (1951): 254–57.  
<http://www.jstor.org/stable/762849>.

<sup>8</sup> “Re M. H. Hertogh, an Infant: *Hertogh v. Amina Binte Mohamed and Others.*”

reformation would not have happened had not Professor Ahmad Ibrahim took the case without the goal of fighting for Islamic law in mind, highlighting his resolve that is against the meek and ambiguous position of Islamic law.

All in all, Professor Tan Sri Datuk Ahmad Mohamed Ibrahim was an influential individual who was very thorough in both his studies and research as contribution in establishing a levelled ground for Islamic Law and Civil Law. It was through his hard work and that led to a creation of platform where people can argue the application of Islamic law in appropriate cases, which is what AIKOL is today. Thus, I hope that we can follow his footsteps in becoming not just a legal practitioner that follows the flow, but to make changes in our legal world, where Islamic Law no longer being shunned upon. Let us all do our duties as *khalifah*, as stated in the Quran 21:107 that translates, “And We have not sent you, [O Muhammad], except as a mercy to the worlds.”

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