

Muslim Family Law: How do Muslim Women pursue divorce in the UK?

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Abstract

This study focuses primarily on the issue ‘How do Muslim women pursue divorce in the UK?’ The aim of the research is to ascertain the choices Muslim women make when pursuing divorce and to determine the consequences of such decisions. The practice of Muslim family law exists within the private sphere, and there is a lack of documented evidence of Muslim marriages and divorce cases reported. This study employs a qualitative research methodology, using phenomenology as the methodological frameworks for the fieldwork. The researcher conducted in-depth interviews with British-Muslim women living in London to gain an understanding of the issue from their ‘lived experience’. Furthermore, the researcher interviewed experts ranging from Imams, Shariah council judges, solicitors, and counsellors; and observed Shariah council hearings. The data collected was analysed using thematic analysis, and the emergent themes from the rich data provide a deep insight of the research problem, allowing a socio-legal examination of the ‘law in context’, firmly embedded in the ‘lived’ experience.

Introduction

Muslim family life represents one of the greatest expressions of religious identity, especially as Muslims feel a need for religious marriage (*nikah*) and divorce (*talaq*).¹ Hence, many Muslims will marry and divorce according to the customary laws of their country of origin.² For Muslims, the marriage (*nikah*) is a moral imperative and binding ‘religio-legal’ contract,

which legitimises sexual intercourse,³ not a sacrament, but spiritually marriage is seen as worship.⁴ *Nikah* is the basis to start a relationship, and found a family, as the Quran prohibits any pre-marital sexual relationship.⁵

English law is a monolithic legal system, meaning there are no foreign or parallel systems of law; as such, matters pertaining to marriage, divorce and children are exclusively legislated by civil law.⁶ Legislation such as the Marriage Act 1949 and, Matrimonial Causes Act 1973, stipulate conditions for a valid marriage and divorce. For a marriage to be valid in the UK, it must be monogamous and meet the requirements of a civil marriage i.e. take place in an approved building and certified by an authorised person. There is an exception made to the Marriage Act for Jews and Quakers who may marry according to their usage, a tradition dating back to the Marriage Act of 1753. Similarly, before granting a decree of divorce or judicial separation, the courts need to be satisfied the marriage is valid; and extra-judicial divorce (e.g. *talaq*) has been invalid in Britain since 1974. The Divorce (Religious Marriages) Act 2002 gives the court the power to refuse a decree absolute if steps are not taken to dissolve a religious marriage; though this Act is primarily used in cases where a '*get*' is refused in Jewish usage, it extends to other religions. In short, any religious marriage or divorce must meet the above-mentioned conditions to be valid in an English civil court. As a result, some Muslims marry twice and divorce twice (i.e. have a religious and a civil process).⁷

Unregistered marriages such as, '*nikah* only' ceremonies conducted in the UK are classed as 'non-marriages', and have no legal recognition and therefore no recourse to family courts in times of marital disputes.⁸ A dual religious and civil marriage ceremony are possible;⁹ however, only 1 in 10 mosques in the UK are registered to provide such a service.¹⁰ Nonetheless, some view that Muslims would not approach a civil court for a religious divorce, as the judge would not refer to Shariah law.¹¹ Thus, Muslims may refer to

themselves as having a distinct ‘law’ or minority legal order (MLO) i.e. non-state normative social action characteristic of state law.¹²

In the absence of any official Shariah body, [diasporic] Muslim communities will follow ‘Private International Law’ in matters of Shariah law.¹³ Muslim men and women turn to religious framework and norms for personal needs and during crisis e.g. divorce.¹⁴ In particular, there is limited scope for Muslim women to divorce, who if their husbands refuse to grant divorce by way of *talaq* (unilateral male initiated divorce) must approach a religious authority to attain release from the marriage whether it be *khula* (female initiated divorce) or *faskh* (judicial annulment). The Muslim community does not recognise secular divorce, and therefore, women granted civil divorce will still be considered married unless they receive an Islamic divorce;¹⁵ thus, one of the reasons for the emergence of Shariah councils.¹⁶ Others argue that turning to religious based alternative dispute resolution (ADR) mechanisms, such as Shariah councils, Muslim women receive unfavourable outcomes and have a weak bargaining position.¹⁷

However, Malik contends there are considerable empirical gaps on understanding the experience of those who use MLO, and whether they face unjust outcomes or secure autonomy as individuals.¹⁸ Existing data show that thousands of disputes between Asians [Muslims] never come to official courts.¹⁹ Thus, this paper aims to explore the ‘lived experience’ of divorce from the perspective of British-Muslim women living in London and examine the views of experts and professionals who advise and support Muslim women who undergo divorce.

Research methodology

This study employed a qualitative methodological approach using ‘phenomenology’, which attempts to understand the meaning and essence of an experience as viewed by participants.²⁰

The researcher conducted in-depth interviews with British-Muslim women, and further interviews with experts, all chosen using purposive sampling techniques. In addition, there were participant observations of Shariah council hearings. The researcher maintained reflexivity throughout the fieldwork i.e. interviews, observations, transcriptions, and data analysis.

The research focused on the central research question, ‘how do British Muslim women pursue divorce in the UK?’ the sub-research questions explored the choices women made when deciding to divorce and the problems faced during and after the divorce process. The research also aimed to explore ‘what role experts played in supporting, shaping and influencing the decisions Muslim women when divorcing?’ The data collected was analysed using thematic analysis, which produced several themes and subthemes related to answering the research questions.

Sample selection

The researcher used a network of contacts using friends, family, colleagues, and associates from the Muslim community to recruit participants. The researcher avoided approaching institutes and organisations such as solicitors, Shariah councils and women’s groups for participants for three reasons. Firstly, it would entail approaching a gatekeeper or someone who controlled access to participants, and, therefore, the difficulty in gaining their permission before approaching participants.²¹ Secondly, previous studies have indicated that approaching one or two particular institutes can represent a minority grouping and not reflect the true nature of the problem.²² Thirdly, the researcher took an inductive method of inquiry, i.e. bottom-up approach, and wanted to explore the problems without testing any hypothesis associated with any institutional practices.²³

The majority of the participants recruited were via convenience sampling and a few via snowballing. The snowballing technique was not as successful as hoped, mainly due to participants feeling, the subject of the study ‘divorce’ was a sensitive matter, and not all their friends or contacts were willing to give an interview. The number of participants selected for this study was based on the concept of gaining ‘data saturation’ whereby the number of interviews continued until the data collected produced no further insights.²⁴

Profile of the women interviewed

The data provided a profile of the women who participated in the study. The participants were all second-generation British-Muslim women living in London. The majority of the women interviewed were in their mid-thirties to their early forties, with the average marital age being eighteen. They all received a British education and were mainly college-educated, and their occupation status nearly evenly split between employed and unemployed.

Expert Interviewees

The researcher interviewed experts i.e. professionals identified as providing services to Muslim women during marital disputes and divorce. The advantage of expert interviews is that they can provide insights into topics, where there are insufficient data or limited available knowledge about the subject.²⁵ The experts chosen were imams, Shariah council judges, solicitors and counsellors. The number of expert interviewees chosen followed the same theory of data saturation used for selecting the Muslim women participants

Findings – Muslim women

Marriage

In researching divorce, it was natural to enquire as to how the participants married. The common themes emerging from the data identified the processes of selecting a suitor, the type of marriage ceremonies undertaken, and the nature of trans-national marriages (TNM).

Arranged marriages highlighted the influence of family members in selecting a suitor and formalities.

My marriage was arranged by mutual agreement. Initially, it was just me and him [husband] at my brother-in-law's house, just to see whether we like each other, we did the formalities straight after. (Kulsuma)

My brothers were not keen on me getting married. I was young and they probably sensed this guy is not suitable for me. My dad had the upper hand. He said "If you don't marry, then go and stay with your brothers. If you think I'm right, then stay with me [i.e. agree to marry]." (Zaynab)

Participants involved in forced marriages described how they were abroad with their family and unaware of any marriage plans.

I didn't know I was getting married. I found out on the wedding day. My brother took me to an empty room. There were about ten to twelve relatives at the door. He locked the door and said, "you're getting married." I couldn't believe it was true, my brother was doing this to me. (Nabila)

Participants that chose own-choice marriages narrated difficulties in their family lives prior to seeking marriage, which led them to choose their own partners.

I met him when I was young. My parents had split up and he was a shoulder to cry on, I wanted a happy ending, so I left home and married him. (Faiza)

Participants chose to marry via either *nikah* and a civil registration or a *nikah* only ceremony.

The participants gave reasons for unregistered marriage.

We had the *nikah* but the main party was not done. They were waiting for his older siblings to marry. I lived at my parents' house and I waited for two years, I couldn't be patient anymore. Only certain people knew about the *nikah* from my family. (Lily)

I wanted a registry. He [husband] kept saying it's not necessary, but I know that in this country it is necessary. He didn't want to do it. (Jahanara)

I just had an Islamic marriage. Not bothered with a civil [registry], because it's my second marriage. It's irrelevant. (Rushna)

With regard to trans-national marriages (TNM), participants married non-UK nationals whilst abroad and visitors to the UK.

Marital problems

Before ascertaining the type of divorce processes pursued, the researcher inquired as to the reasons for the marital breakdown. The participants rarely cited one reason for seeking grounds for divorce, usually, there was a combination of problems. Reasons for divorce related to domestic violence (DV), trans-national marriage (TNM), in-law interference, adultery, polygamy, desertion and unreasonable behaviour e.g. drug addiction. Some of the comments expressed by participants were:

The problem is he changed completely after we got married. He used to beat me up. I got tortured. I wasn't allowed to go out the house. I was not allowed to contact nobody. (Rupa)

I felt a facade behind the wedding, what was his intention to marry me. (Tina)

From day one, there was a problem. My mother-in-law never accepted us. She said, "your marriage will break down." She had plans for him to marry his cousin abroad. (Fahima)

I knocked on the door and a woman opened it. I asked for my husband, he came rushing out and said, "let's go". I said, "Who is she?" He said, "There's nothing going on, she's only a friend". Later I found out she was three months pregnant with his baby. (Faiza)

Mediation and reconciliation

When a dispute occurred in the marriage, the participants mentioned that mediation or reconciliation involved their families, in-laws, imams, and Islamic counsellors.

We had a meeting they brought my husband and they had an imam present. They [family] did not discuss the issues; they just said, “say sorry to each other.” (Aisha)

We went to a marriage counsellor, a professional from an Islamic organisation, but there’s only so much that they can do. (Lily)

Participants also mentioned pressure received from the family to reconcile and the lack of support during separation.

My brothers said, “Divorce is not an option, forgive him, and give him one more chance.” Clearly to my family divorce is a bad thing, how are they going to face people? So it was a case of stay in your husband’s house. (Zaynab)

We separated; I went to my parents’ house. My dad was so embarrassed. He couldn’t stand me, he used to hate the sight of me. (Rupa)

Divorce

The divorce process for participants with a civil registered marriage varied from seeking a civil divorce first and then pursuing a religious divorce and vice versa. Participants mentioned how they lacked knowledge of the civil divorce process and received guidance from others.

He walked out the house and said he was not returning. His solicitor wrote to me. I showed the letter to others, I didn’t understand, I got scared. I found a solicitor, who explained my husband wanted a divorce, and access to the children. (Parvin)

He gave me the *talaq*, but I still need to get a civil divorce. (Henna)

Participants with unregistered marriages only pursued an Islamic divorce; they were aware that they had no recourse to attend a civil court for a divorce, and neither did they have the desire to follow a civil process. The easiest process of Islamic divorce was when the husband gave *talaq*.

We were separated. He came one day and told me to sit in the car. I sat down, he said, "I'm divorcing you, I'm divorcing you, I'm divorcing you" then turned to me and said 'that's it you're divorced.'" (Rupa)

We were estranged. I said "fine, just divorce me." A few days later, he gave me *talaq*.
Hearing divorce was difficult to swallow. It seemed unreal. (Faiza)

In contrast, the withholding of religious divorce by the husband proved problematic for participants with civil registered and unregistered marriages. Moreover, the ambiguity of the status of civil divorce in relation to a religious divorce further complicated matters.

I spoke to the mosque. They told me, according to Shariah law I needed an Islamic divorce. I said, "I got a civil divorce and been separated a long time, why do I need to go through an Islamic divorce?" They said, "You married the Islamic way, you need to finish the Islamic way." (Nabila)

Where the husband refused to grant a religious divorce, participants either approached a Shariah council, or accepted their civil divorce, or a long separation as sufficient for an Islamic divorce.

He [husband] said he was never going to give me a divorce. So I asked my cousin, he's a Hafiz [memorised Quran], he said, "apply to the Shariah council they will help you."
(Jahanara)

I went to the mosque and they were not helpful. I asked a friend who studied Shariah, and I was told that a long separation after a civil divorce means that you are no longer in wedlock.
(Aisha)

I went to the mosque and asked for an Islamic divorce. The imam tried to patch things up, I said, “Even after I’ve been through DV?” He said, “DV is not a good enough reason.” My brother said, “come on, let’s go, you’ve got a civil divorce and that’s enough.” (Salma)

Participants explained the importance of Islamic divorce, which allowed them to be free from the marriage and move on with their lives, in compliance with norms in the Muslim community.

To hear *talaq* meant it was official, you’ve severed the link with them [in-laws]. (Faiza)

Otherwise, people think you are still married. (Fahima)

I asked for the divorce certificate from the Shariah council. He wasn’t bothered, but he gave it a year later. I needed it to move on. I needed proof my first marriage ended for any potential groom. (Kulsuma)

With regard to pursuing maintenance and *mahr*, participants either abandoned chasing payment or found difficulty in obtaining payments.

I did not go for maintenance it was a personal choice. I was not going to beg, if he’s going to give it, he should do so voluntarily. (Faiza)

He told the courts “I’m not working.” He left work. They couldn’t get anything from him, they said, “he’s unemployed.” (Parvin)

He wouldn’t give my *mahr*. I called the mosque to get advice, and I did not find them helpful, so I’ve left it. I don’t want to deal with my ‘ex’ anymore. (Aisha)

Post-divorce, participants expressed that men moved on quickly and remarried without to be questioned by the Muslim community. On the other hand, divorced women were labelled, stigmatised, and blamed for the divorce. Nonetheless, some participants remarried; though they viewed, the Muslim community did not support divorced women.

Findings - Experts

In analysing the data, the experts can be categorised into three broad categories: those who provide Islamic or Shariah services, those who provide legal services, and those who provide counselling to women.

Use of services

The experts expressed differences in the level that Muslim women would refer to their services. The imams felt they received many inquiries especially at the early stage of any marital disputes, but overall the experts including the solicitors and counsellors felt resistance to using their services.

One of the first points for women in this situation who seek divorce or clarification is their local Imam and scholars. (Imam #1)

What happens is that people generally ask *fiqhy* (jurisprudence) questions to those who have studied some Islamic sciences. (Imam #2)

She [client] came to the solicitors because of her family. She wants to save the marriage; her family pressured her to divorce due to his violence. (Solicitor #1)

Sometimes clients want to stay in a relationship. They only come to us because of social services. (DV counsellor #1)

People try to rectify their own situation before approaching family and trusted friends and the imam is a last resort. (Imam #1)

Marriage

The experts appreciated why Muslim women needed to have an Islamic marriage. The imams felt *nikah* was a social norm, validating marriage in the eyes of God and the Muslim community, and that civil registration was not sufficient for an Islamic marriage.

People want Islamic marriage because of religious feelings and sentiments. (Imam #2)

Obviously, any Muslim has to get an Islamic marriage, it's a norm, I mean a Muslim cannot be married until they do the Islamic *nikah* (Imam #1)

Civil registration is for legal convenience. For Muslims civil registry is not getting married but a pre-party to the *nikah*, it carries no weight. The *nikah* has weight in the eyes of god, faith and the community. The couple would not live together after civil registration. (SC Judge #1)

The solicitors also agreed that their clients needed an Islamic marriage, though some felt clients may be confused with its legal validity.

For our clients, there is a religious need for *nikah*. (Solicitor #1)

Certain clients think English law recognises *nikah*. (Solicitor #2)

In general, the experts agreed civil registration of marriage provided women legal protection and rights.

I'm not a lawyer but it actually the law of UK provides a safety net and protection for women it's actually Islamic in my opinion. (Imam #1)

English law does not let women and children suffer. (Solicitor #2)

Nikah only marriages give women less protection; men feel they have more rights over the women. (DV counsellor #3)

Moreover, the solicitors reiterated concerns that unregistered marriages left clients without legal protection.

Women in *nikah* only marriages have no rights. They are treated legally as cohabittees. (Solicitor #1)

Non-registration of marriages is throwing away the opportunity to justice. Registration allows access to courts and the spouses are protected financially. (Solicitor #2)

Even so, the experts commented that civil registration of marriages did not necessarily stop Muslim women facing misery within their marriage and the home environment.

Women are told put up with it [DV], your reward is *Jannah* [Paradise]. (DV counsellor #2)

This is the husband's third civil marriage, the previous [two] ended in divorce, as he was violent. (Solicitor #3)

It is good that people do not live together [in extended families] but there is still the wider network, social media, so family members can still influence the husband and the wife. (Imam #2)

Mediation

The imams viewed that couples needed counselling before marital problems escalated. The common reasons for marital disputes were over roles, work, duties at home, finance, sexual frustration and DV. However, the experts agreed to turn to family and friends did not always resolve problems. The main concern for their clients was that disclosure to outsiders would bring shame upon the family.

Families make matters worse; they have an inability to make things better. (SC Judge)

People use friends because of less cost, trust and culture; but proper counselling can save the marriage. (Solicitor #1)

Domestic Violence

According to the solicitors, DV is common in Islamic divorce cases. The DV counsellors expressed that the perpetrators were mainly the husbands and the in-laws, and were manipulative and cunning at hiding their actions from others.

Sometimes her [wife] family will never ever know about the DV, as the husband looks squeaky clean. (DV Counsellor #3)

Victims are isolated in the home, and the wife is vulnerable especially if she lives with the in-laws, mother-in-laws are controlling. (Solicitor #3)

The DV counsellors viewed that women stayed in their marriages despite the DV, as they genuinely cared for their husband, or had children or married cousins, and therefore, felt obligated to remain in the marriage. The counsellors felt women viewed marriage as their whole life and try to make it work even if it is a false hope. The solicitors viewed their clients had extra pressure from the Muslim community to remain silent about DV.

Women told live with it, he will grow out of it, and that she will bring shame [if she speaks out]. (Solicitor #1)

The GP or health visitor may be the first person to spot the issue and give women an opportunity to speak. (Solicitor #3)

However, all the experts agreed that religion did not justify DV, and disputed religious text, which referenced disciplining of the wife.

The word 'disobedience' (*nushuz*) in the Quranic verse 4:34 is misunderstood. Women do not have to cook and clean as a religious obligation; it just has to be done. (Imam #2)

Men think they have authority [over women] but they don't. (SC Judge)

Even so, some perpetrators will use such text to their advantage.

In the Quran, man has power over women, therefore he says, "I do whatever I do", and refers to hadith "If you don't do my demands [i.e. sexual cohabitation] no matter what, then the angels will curse you." (DV Counsellor #1)

In tackling DV, the counsellors commented it takes courage for women to speak about DV in the public domain. There is a risk to the women if they speak out and consequences if the husband finds out. Hence, women have to leave the situation to find physical safety, resolve housing issues and children before they can fully recover. Even then, the experts viewed the women were not ready for divorce.

Women are not ready for divorce it is the last resort. Women do not know their rights, usually, they learn from police and victim support. (Solicitor #3)

Divorce

The imams expressed that Islamic divorce was a simple and quick process, and necessary to conclude the matter in a religious way.

People want a religious divorce; it gives them a sense of comfort. (Imam #1)

People want reassurance they are Islamically cleared up, and not liable to God. (Imam #2)

However, the religious experts differed on the status of a civil divorce in relation to an Islamic divorce.

If the husband signs the consent, in the Hanafi opinion it is an Islamic divorce. (Imam #1)

If husband contests the divorce, we have to apply Islamic jurisprudence (*fiqh*). (SC Judge #1)

The solicitors raised concerns that Muslim men withheld Islamic divorce to torment the spouse and stop them remarrying, and refused to pay *mahr* or maintenance. They viewed the civil divorce process was fair to women, but unregistered marriages left women with no recourse to civil courts for financial relief. They were also concerned that women coming out of broken marriages lacked financial support, which affected their ability to pursue divorce cases in court. Moreover, the counsellors expressed that women would leave their marriages only as a last resort.

Most scholars tell clients they need an Islamic divorce. (Solicitor #1)

Under English law, the wife and children are not made homeless; 95% of issues are resolved, *mahr*, jewellery, furniture, she gets a bigger share. (Solicitor #2)

There is no legal aid unless DV involved. Court fees are a problem for women on benefits, who do not pursue maintenance and are left as destitute. (Solicitor #3)

Women leave a situation after exhausting all other means. (DV counsellor #3)

Culture

The counsellors remarked that Muslim couples in their home life revert to a traditional setting in which culture has a strong influence on beliefs and values. The solicitors viewed that women complied with men because of the shame of returning to their families divorced, and therefore agreed to harsh rules made after marriage, which with time restricted and controlled the women. Post-divorce, Muslim women faced being labelled and stigmatised by the Muslim community and were seen as the cause of the marital breakdown.

Men are rarely accounted and move on quicker after divorce, while the community finds it easier to pick on women who are seen as weak. (DV counsellor #2)

Society judges women harshly; people suspect women are the problem in divorce cases.
(Solicitor #1)

Discussion

The findings show the narratives from the participants and the experts are similar, and there a connection between the lived experience of the participants and the services provided by the professional support services.

In examining the experience of marriage, the importance of the *nikah* ceremony was evident among the participants, who viewed *nikah* as the actual marriage, and the civil registration as a secondary issue. The *nikah* carried more weight in the eyes of the Muslim community and involved the family in its arrangement and celebration. The experts appreciated their clients need for *nikah*, but recommended civil registration for legal rights and protection, hence, unregistered marriages were a concern.

The marital problems experienced by the participants were in some cases commonplace with other groups in society and in some instances more religio-culturally specific for Muslims. For example, the experts mentioned domestic violence was common in Muslim marriages, which is a problem shared with the wider society. However, there were instances where perpetrators used religion and culture to justify domestic violence against the participants. Nonetheless, the experts agreed religion does not condone DV, though they acknowledged religious and cultural practices exist among Muslims that contribute to this problem. Similarly, reasons for divorce, like adultery and desertion are commonly shared with society, whereas problems such as in-law interference, TNM and polygamy were religio-cultural specific.

In resolving marital disputes, participants would first turn to family, friends, and use outsiders such as imams, mediators and counsellors as a last resort. The concepts of shame and honour restricted participants from turning to those outside of the family. The family, in turn, pressured participants to reconcile, which meant marital problems were left unresolved, and as a result, participants suffered longer in their marriages. In some cases, by the time experts were involved, the disputes had escalated, with the marriage irretrievably broken down and divorce becoming inevitable.

In general, for participants, divorce was the last resort. Participants with civil registered marriages pursued a civil divorce, which followed a uniform process from the petition to decree nisi and decree absolute. Participants with *nikah* only marriages relied on their husbands to pronounce *talaq* and if refused turned to Shariah councils. However, the process for Shariah council divorce differentiated between husband-initiated (*talaq*) and wife-initiated (*khula*) applications. Participants questioned the higher fees and longer process for *khula* applications but accepted that Shariah councils have the authority to issue an Islamic divorce.

The process of gaining a religious divorce for participants with a civil divorce was a more complex issue. Firstly, some participants were shocked to learn their civil divorce was not valid as an Islamic divorce, and upon enquiry found differing opinions among religious sources on the issue. Secondly, the husband's refusal to grant religious divorce left participants potentially in a 'limping marriage'. Thirdly, participants faced confusion over the various forms of Islamic divorce. Nonetheless, participants demonstrated that in the absence of any official Shariah law, attaining Islamic divorce was not solely reliant upon Shariah councils; rather the reality of understanding Shariah was subjective and pluralistic.

With regard to financial relief, the non-payment of *mahr* and maintenance were common themes. Some participants chose to forgo financial relief in preference to avoid further contact with their husbands. Other participants experienced that Shariah councils were powerless to enforce *mahr* payments, whilst civil courts were unable to order maintenance payments if their husbands were unemployed.

Concluding remarks

This paper presents the preliminary findings from a larger socio-legal study investigating the phenomenon of Muslim divorce in the UK. The data highlight the complexities faced by British-Muslim women in pursuing divorce. The civil registration of marriages may provide women with legal rights and protection, though not necessarily a harmonious marriage. The religio-cultural expectations of Muslim women in marriage and divorce further complicate matters, adding pressure on women to conform to social norms within the Muslim community. Nonetheless, this study gives an insight into how the participants overcame barriers in the pursuit of divorce and negotiated conflicts between religion, culture, civil law and Shariah law.

Notes

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