**PRISMA-Based Study on Integrating Islamic Principles into Contemporary Legal Systems: A Comparative Analysis of Qur'anic Human Rights Law in Egypt and Indonesia**

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**ABSTRACT:**

*This study examines the comparative application of human rights law derived from the Qur'an in Egypt and Indonesia, focusing on integrating Islamic principles into modern legal frameworks. It provides a background on the historical and cultural contexts of both countries, highlighting their shared reliance on Islamic teachings alongside secular legal systems. The research addresses how each nation interprets and applies Qur'anic principles to contemporary human rights challenges, identifying the key issue of balancing universal human rights standards with the specificities of Islamic jurisprudence, which often leads to differences in application. Employing the PRISMA framework (Preferred Reporting Items for Systematic Reviews and Meta-Analyses), the study ensures a systematic and rigorous review of legal texts, academic literature, and case studies to identify key themes and patterns. The findings reveal that while both countries uphold Qur'anic values in protecting fundamental rights, their approaches differ due to cultural, political, and historical influences. By demonstrating the utility of the PRISMA framework in producing reliable results, the research contributes to understanding the dynamic relationship between religion and law and offers insights into harmonizing Islamic principles with global human rights frameworks.*

Studi ini mengkaji penerapan hukum hak asasi manusia yang bersumber dari Al-Qur'an di Mesir dan Indonesia, dengan fokus pada integrasi prinsip-prinsip Islam ke dalam kerangka hukum modern. Penelitian ini memberikan latar belakang tentang konteks sejarah dan budaya kedua negara, yang menyoroti ketergantungan bersama mereka pada ajaran Islam di samping sistem hukum sekuler. Penelitian ini membahas bagaimana masing-masing negara menafsirkan dan menerapkan prinsip-prinsip Al-Qur'an terhadap tantangan hak asasi manusia kontemporer, dengan mengidentifikasi isu utama berupa keseimbangan antara standar hak asasi manusia universal dan kekhususan yurisprudensi Islam, yang sering kali menghasilkan perbedaan dalam penerapannya. Dengan menggunakan kerangka kerja PRISMA (Preferred Reporting Items for Systematic Reviews and Meta-Analyses), studi ini memastikan tinjauan yang sistematis dan ketat terhadap teks hukum, literatur akademik, dan studi kasus untuk mengidentifikasi tema dan pola utama. Temuan menunjukkan bahwa meskipun kedua negara menegakkan nilai-nilai Al-Qur'an dalam melindungi hak-hak dasar, pendekatan mereka berbeda karena pengaruh budaya, politik, dan sejarah. Dengan menunjukkan kegunaan kerangka kerja PRISMA dalam menghasilkan hasil yang andal, penelitian ini berkontribusi pada pemahaman hubungan dinamis antara agama dan hukum serta menawarkan wawasan tentang upaya harmonisasi prinsip-prinsip Islam dengan kerangka hak asasi manusia global.

**Keywords:** *Human Rights Law, Islamic Jurisprudence, Legal Systems, PRISMA Framework, Islamic Principles.*

1. **INTRODUCTION**

Human rights have become a cornerstone of contemporary global discourse, shaping international law and influencing political, social, and legal frameworks across various societies. The recognition of human rights is particularly significant in Muslim-majority countries, where Islamic teachings, derived from the Qur'an and the Hadiths (sayings and actions of the Prophet Muhammad, PBUH), offer a foundational basis for understanding human dignity, justice, and equality (Fiala-Butora 2022).

However, the challenge lies in reconciling these religious principles with modern human rights frameworks that are often shaped by secular, international norms. This study addresses the critical question of how Islamic principles, particularly those derived from the Qur'an, are applied within the human rights legal systems of Egypt and Indonesia, two countries that, despite their shared reliance on Islamic teachings, have different historical, cultural, and political contexts in implementing these principles(A.N. et al. 2024). By analyzing how these two nations interpret and apply Qur'anic principles and Hadiths to contemporary human rights issues, the research will provide a nuanced understanding of the interplay between religion and law in the field of human rights (Shah and Sivakumaran 2024).

The significance of this research is multifaceted. First, it sheds light on how Islamic jurisprudence, rooted in the Qur'an and the teachings of the Prophet Muhammad, has influenced the human rights discourse in two distinct legal systems: Egypt, with its long history of Islamic scholarship and a complex political landscape, and Indonesia, the world’s largest Muslim-majority country, which is recognized for its pluralistic approach to governance(Anwar et al. 2024). While both nations adhere to Islamic teachings, they approach the integration of these principles into their legal systems in ways that reflect their respective cultural, political, and historical circumstances(Suwarsono et al. 2024). Egypt’s legal system blends Islamic law (Shari'ah) with secular law, creating a unique and sometimes contentious relationship between religious values and human rights(Wahid et al. 2023). Indonesia, on the other hand, strives to accommodate Islamic principles within a broader legal framework that respects religious and cultural diversity(Nirwana, Suri, et al. 2024). The research question posed by this study, therefore, is not only relevant to scholars of Islamic law and human rights but also to policymakers and legal practitioners who seek to understand the dynamics of law in Muslim-majority countries (Greenberg 2024; Marthoenis, Nirwana, and Fathiariani 2019; Waston, Muthoifin, et al. 2024).

The application of human rights principles based on the Qur'an in Egypt and Indonesia presents a complex landscape, where religious teachings are interpreted in the context of modern legal norms. The Qur'an itself provides numerous verses that advocate for justice, equality, and the dignity of all human beings, but the interpretation and application of these verses in the contemporary legal system often raise significant questions(Waston, Wiranto, et al. 2024). For instance, Surah Al-Isra (17:70) states, “And We have certainly honored the children of Adam,” affirming the inherent dignity of all humans. This verse serves as a cornerstone in Islamic thought, indicating that every individual is created with inherent respect and dignity. The Qur'an further outlines the rights of individuals, including the right to be treated justly and to have their basic needs met. In Surah Al-Baqarah (2:177), Allah emphasizes the importance of justice, stating, “It is not righteousness that you turn your faces towards the East or the West, but righteousness is in one who believes in Allah, the Last Day, the Angels, the Book, and the Prophets; and gives his wealth, despite his love for it, to relatives, orphans, the needy, the traveler, those who ask [for help], and for freeing slaves.” This verse underlines not only the importance of justice but also the obligation of individuals and communities to ensure the welfare of the most vulnerable in society (Mahmudulhassan et al. 2024; Da Silva 2023; Sukisno et al. 2024)

Alongside the Qur'an, the Hadiths of the Prophet Muhammad (PBUH) further emphasize the dignity and equality of human beings. The Prophet's teachings on justice and equality are numerous, and one of the most powerful Hadiths in relation to human rights is found in Sahih Muslim, where the Prophet Muhammad (PBUH) said, “All of you are equal; no one is superior to another except by piety and good deeds.” This Hadith reinforces the Islamic view that all human beings, regardless of their race, wealth, or status, are entitled to the same basic rights and respect(Yahya, Hasan, and AN 2022). Furthermore, the Prophet’s final sermon, delivered during the Hajj pilgrimage, is a powerful reminder of the universality of human rights. He declared, “All mankind is from Adam and Eve. No Arab has superiority over a non-Arab, and no non-Arab has superiority over an Arab; a white has no superiority over a black, nor does a black have any superiority over a white; none have superiority over another except by piety and good action.” These teachings emphasize the idea that human rights, as understood in Islam, transcend ethnic, racial, and social boundaries and are grounded in the principles of justice and equality (Andri Nirwana et al. 2024; Kiviorg 2022; Muhtar Arifin Sholeh et al. 2023; Yayuli 2021).

Despite the clarity of these Qur'anic verses and Hadiths, the practical application of these principles within Islamic-majority countries has sparked significant debate. In Egypt, for instance, the integration of Islamic principles with the modern human rights framework is often fraught with tensions(Kerwanto 2024). Egypt's legal system, which combines Shari'ah with secular law, creates a dynamic where Islamic principles, such as those advocating for justice and equality, sometimes conflict with the country’s political realities and international human rights obligations(Budiono et al. 2023). While Egypt's constitution acknowledges the importance of Islamic law and human dignity, issues such as gender equality, freedom of expression, and minority rights have raised concerns regarding the extent to which the legal system fully reflects Qur'anic values in practice(Arfan et al. 2024). The interpretation and application of these principles vary, influenced by political and judicial factors that often challenge the ideal of harmonizing Islamic law with international human rights standards (Syukrawati et al. 2024).

In contrast, Indonesia offers a different approach to integrating Islamic principles within its legal framework. As the world’s largest Muslim-majority country, Indonesia has a legal system that incorporates both Islamic principles and international human rights norms, but with a stronger focus on pluralism and democratic values(Undari 2022). While the Indonesian Constitution guarantees religious freedom, the implementation of Shari'ah law in certain regions, such as Aceh, has raised questions about how Islamic principles can coexist with the rights of non-Muslims and other minority groups(Nur Hidayah et al. 2023). Despite these challenges, Indonesia’s legal framework has provided a more flexible and inclusive approach to human rights, one that seeks to respect the diversity of religious and cultural identities within the country while also incorporating Islamic teachings (Crawford 2024).

The tension between universal human rights norms and Islamic jurisprudence is one of the most significant challenges faced by both Egypt and Indonesia in the application of Qur'anic principles(Achyani and Riyardi 2024). The Qur'an provides a clear foundation for the protection of human dignity and justice, but its interpretation often varies depending on the cultural, political, and historical context in which it is applied(Pasha and Gumay 2023). Issues such as freedom of speech, the rights of women, and the treatment of religious minorities are areas where Islamic interpretations may diverge from global human rights frameworks(Jumadi 2016). In Egypt, for instance, while the Qur'an promotes justice and equality, societal norms and political influences may limit the extent to which these rights are fully realized in practice(Rajiani et al. 2023). Similarly, in Indonesia, while the Qur'an’s teachings on justice and equality are widely respected, the pluralistic nature of the society means that human rights issues are often addressed with a degree of flexibility that may not always align with international human rights conventions (Elbanna 2025b).

The primary aim of this study is to explore how Egypt and Indonesia reconcile the teachings of the Qur'an with international human rights frameworks, using a qualitative research approach(Masduki, Suwarsono, and Teguh Budiarto 2024). By focusing on the Qur'an and Hadiths, the study will examine how Islamic principles are interpreted in the legal systems of both countries(Taufik 2023). The research will involve a systematic review of legal texts, case studies, and scholarly interpretations, utilizing the PRISMA framework (Preferred Reporting Items for Systematic Reviews and Meta-Analyses)(Hanifah Kusumastuti 2023). The PRISMA framework ensures that the research is conducted in a rigorous and structured manner, enabling a comprehensive analysis of the existing literature on human rights in the context of Islamic law(Thoyib, Jinan, and Hidayat 2023). By employing this methodology, the study aims to identify key themes and patterns in the application of Islamic principles to human rights in Egypt and Indonesia, highlighting both similarities and differences between the two countries (Elbanna 2025a).

In reviewing the literature, this study will contribute to the ongoing discourse on the compatibility of Islamic principles with global human rights standards. Scholars have long debated the tension between traditional interpretations of Shari'ah and the more liberal readings of Islamic law that attempt to reconcile Islamic values with international human rights frameworks(Adanu 2024). Some argue that modern reinterpretations of Islamic law, particularly through the process of ijtihad (independent legal reasoning), can play a crucial role in adapting Islamic principles to contemporary human rights challenges(Abubakar 2024). Others, however, caution that the rigid application of traditional interpretations can lead to human rights violations, particularly in areas such as gender equality and freedom of expression (Elbanna 2024).

The literature on human rights law based on the Qur'an provides a diverse range of perspectives on the role of Islamic principles in the modern legal system. While there is a strong foundation in Islamic texts advocating for justice, dignity, and equality, the application of these principles varies widely across different contexts(Muthoifin, Hamid, et al. 2024). In countries like Egypt and Indonesia, the interpretation of Shari'ah law in relation to human rights remains a dynamic and ongoing issue(Muthoifin, Abuzar, et al. 2024). The challenge, then, is to find an interpretation of Islamic law that respects both the essential values of Islam and the broader framework of universal human rights (Elbanna and Nirwana 2025).

This study aims to fill this gap in the literature by providing a comparative analysis of Egypt and Indonesia, focusing on the ways in which these countries integrate Islamic principles into their human rights frameworks(Rhain et al. 2024). The research will explore how the Qur'anic principles of justice, equality, and dignity are applied in practice and will offer insights into the challenges and opportunities that arise from the intersection of Islamic law and international human rights standards(Ardiansyah, Mahmudulhassan, et al. 2024). Ultimately, this study seeks to contribute to a better understanding of the dynamic relationship between religion and law in the field of human rights, offering valuable insights for scholars, policymakers, and practitioners in the area of human rights law.

1. **METHOD**

The methodology for this study is designed to provide a comprehensive and structured approach to analyzing the integration of Qur'anic principles with human rights law in Egypt and Indonesia. To ensure rigor and transparency, the study uses the PRISMA (Preferred Reporting Items for Systematic Reviews and Meta-Analyses) framework. The PRISMA framework, originally developed for systematic reviews and meta-analyses, is particularly useful in organizing the research process by providing a step-by-step guide to identify, screen, and select relevant sources. In the context of this study, PRISMA allows for a systematic examination of legal texts, academic articles, case studies, and other pertinent sources, ensuring that the analysis remains objective, comprehensive, and well-documented (Greenberg 2024).

The first step in this methodology was the identification of sources related to the application of human rights law in Egypt and Indonesia, specifically in the context of Islamic teachings. This involved a search of academic databases(Google Scholar and Scopus), legal journals, and relevant books, focusing on sources that address the Qur'an’s teachings on human rights, the role of Shari'ah in contemporary legal systems, and the intersection of Islamic law with international human rights standards. Key terms used in this search included "Qur'an and human rights," "Shari'ah law in Egypt," "Islamic law and human rights in Indonesia," and "Islamic jurisprudence."

After identifying a broad range of potential sources, the study utilized the PRISMA framework's inclusion and exclusion criteria to filter the materials. The inclusion criteria ensured that only those sources directly related to the intersection of Islamic teachings and human rights law in the context of Egypt and Indonesia were considered. The exclusion criteria removed sources that were either too general or not directly relevant to the research question. This step is crucial to narrowing down the focus and ensuring that the study draws from sources that are both specific and reliable (Ghanea 2022).

Following the identification and selection of relevant literature, the study then conducted a detailed analysis of the chosen materials. This analysis involved reviewing legal texts, case law, academic articles, and scholarly interpretations to understand how each country interprets and applies Qur'anic principles related to human rights. Special attention was given to the ways in which these interpretations reflect the balance between traditional Islamic jurisprudence and modern human rights standards (Kiviorg 2022).

A key part of the analysis was examining the practical application of these principles within each country's legal system. For Egypt, this involved analyzing constitutional documents, legal codes, and case studies that reflect the country's approach to human rights within the framework of Islamic law. In Indonesia, the study focused on how Islamic principles are incorporated into the national legal system, especially in regions like Aceh where Shari'ah law is officially implemented. The analysis also considered the role of international human rights standards in shaping domestic legal reforms in both countries (Madson 2022).

To enhance the robustness of the findings, the study utilized a comparative approach, drawing direct comparisons between Egypt and Indonesia based on the application of Qur'anic teachings in their respective legal systems. This comparative framework allowed the research to highlight both the similarities and differences in how these two countries approach human rights law within the context of Islam, offering valuable insights into the challenges and opportunities for reconciling Islamic principles with global human rights norms.

***Fig. 1.*** The systematic review process using the PRISMA statement template based on three phases that are identification, screening and included.

**Prisma framework**

Records identified from\*:

Scopus Databases (n =300 )

Google Scholar (n =200 )

**Identification**

Records removed *before screening*:

Duplicate records removed (n = 0)

Records screened

(n =350 )

Records excluded

(n =150 )

"Qur'an and human rights," "Shari'ah law in Egypt," "Islamic law and human rights in Indonesia," and "Islamic jurisprudence."

Key terms used in this search

**Screening**

150 studies passed the eligibility check based on the title and abstract.

50 studies were finally included for detailed analysis.

**Included**

**III. RESULT AND DISCUSSION**

The results and discussion of this study focus on analyzing the integration of Qur'anic principles related to human rights in the legal systems of Egypt and Indonesia, with special emphasis on the ways these principles are interpreted and applied in contemporary settings. The comparative analysis reveals important insights into how Islamic teachings are translated into legal practice, highlighting the strengths and limitations of each system in aligning with universal human rights standards (Favalli 2024).

**Results**

The analysis of the literature reveals significant variations in the interpretation and application of human rights law based on the Qur'an in Egypt and Indonesia. Both countries, while predominantly Muslim, have adopted different approaches to integrating Islamic principles into their national legal frameworks(Nirwana, Arfan, et al. 2024). In Egypt, the legal system operates with a combination of Shari'ah law and secular legal norms, whereas Indonesia, while also incorporating Shari'ah principles in some regions, maintains a more pluralistic approach to governance and law (Da Silva 2023).

In Egypt, the role of Shari'ah in law is significant, with the country’s Constitution recognizing Islam as the state religion and Shari'ah as the main source of legislation. The influence of Islamic principles in shaping the legal system is especially evident in family law, inheritance, and criminal law. However, the practical application of human rights based on the Qur'an in Egypt has been marked by tension, particularly in the areas of gender equality and freedom of expression(Sholeh et al. 2024). For instance, while the Qur'an emphasizes the equality of all humans, the implementation of gender equality has been slow, and women's rights continue to be a contentious issue, especially in the political and social spheres (Steinerte and Ploton 2023).

One example of the Qur'anic emphasis on justice is the verse, "O mankind, indeed We have created you from male and female and made you peoples and tribes that you may know one another. Indeed, the most noble of you in the sight of Allah is the most righteous of you" (Qur'an 49:13). While this verse affirms the equality of all human beings, the interpretation and application of these principles in Egyptian law often remain conservative, particularly when it comes to women's rights and personal freedoms (Murray et al. 2024).

In contrast, Indonesia adopts a more flexible approach, especially in the way it integrates Shari'ah with democratic governance. The Indonesian Constitution guarantees the protection of human rights for all citizens, regardless of their religion, and the legal system reflects a balance between Islamic teachings and international human rights standards (Helmina et al. 2024). In regions such as Aceh, where Shari'ah law is formally applied, human rights issues, particularly concerning women’s rights and religious freedoms, often come to the forefront. However, the Indonesian government’s commitment to pluralism and democracy provides a more inclusive platform for addressing these issues, allowing for legal reforms that promote both Islamic values and human rights (Flatto 2024).

Indonesia’s approach is reflected in the following Qur'anic verse: "And if you judge, judge between them with justice. Indeed, Allah loves those who act justly" (Qur'an 5:42). This verse underscores the importance of justice, a value that resonates strongly within Indonesia's legal system, particularly as it strives to maintain a balance between Shari'ah and human rights principles (Sondhi et al. 2024).

In both countries, the role of ijtihad, or independent legal reasoning, is pivotal in shaping the application of Shari'ah law in modern society. In Egypt, ijtihad has been used sparingly, and many conservative interpretations of Shari'ah continue to dominate(An et al. 2025). In Indonesia, however, ijtihad has played a more significant role in the evolution of human rights law, allowing for a reinterpretation of Islamic texts in line with contemporary human rights standards (Saifuddin et al. 2024).

***Table 1:*** Summarizes the key findings regarding the application of Qur'anic principles in the human rights laws of Egypt and Indonesia.

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| Aspect | Egypt | Indonesia |
| Constitutional Framework | Shari'ah recognized as a source of law. Secular law also plays a role. | Constitution guarantees human rights for all. Shari'ah implemented regionally. |
| Women's Rights | Gender equality is often contested; women face limitations in certain legal areas. | More progressive in terms of women's rights, especially in urban areas, but still issues in Shari'ah-applying regions. |
| Freedom of Expression | Restricted in certain contexts due to conservative interpretations of Islam. | Greater freedom, although challenges exist in conservative regions like Aceh. |
| Religious Freedom | Religious minorities have limited rights; state religion is Islam. | Stronger religious pluralism, though there are tensions in Shari'ah-implemented areas. |
| Role of Ijtihad | Ijtihad is used sparingly, and traditional interpretations dominate. | Ijtihad plays a significant role in adapting Islamic principles to modern human rights norms. |

**Discussion**

The findings of this study provide an in-depth understanding of how the Qur'an’s teachings on justice, equality, and human dignity are interpreted and applied in the legal systems of Egypt and Indonesia. Both countries reflect the complexities of balancing traditional Islamic values with modern human rights frameworks.

In Egypt, while the Qur'an’s principles of justice and equality are clearly articulated, the application of these values is limited by conservative interpretations of Shari'ah law. Gender equality, for instance, remains an area of contention. Despite the Qur'anic assertion that men and women are equal in the sight of Allah, Egyptian law often places women in a subordinate role, particularly in the areas of inheritance, marriage, and divorce(Ardiansyah, Waston, et al. 2024). The Qur'an clearly states that "For men is a share of what the parents and close relatives leave, and for women is a share of what the parents and close relatives leave" (Qur'an 4:7), yet the inheritance laws in Egypt continue to reflect gender inequality in practice. This highlights a gap between the Qur'anic principle of equality and its practical application in the legal system.

Indonesia, on the other hand, demonstrates a more inclusive approach to human rights. While regions such as Aceh have faced criticism for their strict implementation of Shari'ah law, the broader Indonesian legal system allows for a wider interpretation of human rights. The country’s pluralistic society has allowed for a legal framework that incorporates Islamic values while respecting international human rights standards(AN, ., et al. 2024). This is particularly evident in the protection of religious freedoms, where Indonesia has a strong tradition of religious tolerance that is not as readily observed in Egypt(Ali et al. 2025).

The role of ijtihad in Indonesia has also allowed for a more progressive and evolving interpretation of Islamic law. Scholars in Indonesia have embraced the concept of ijtihad to address contemporary human rights issues, such as gender equality and religious freedom(AN, Mahmudulhassan, et al. 2024). By adapting traditional interpretations to modern realities, ijtihad has become an essential tool for aligning Islamic principles with international human rights norms.

Despite these differences, both countries face similar challenges in reconciling traditional Islamic teachings with modern legal norms. The tension between maintaining the integrity of Islamic law and adhering to global human rights standards remains a key issue in both Egypt and Indonesia(Nurul Hidayah, Rasyid, and Windarto 2024). This is particularly true in areas such as gender equality, freedom of expression, and religious freedom. Both countries must navigate the delicate balance between honoring Islamic teachings and ensuring the protection of fundamental human rights.

The study highlights the diverse ways in which Islamic law and Qur'anic principles are applied in the legal systems of Egypt and Indonesia. While both countries incorporate Shari'ah principles into their legal frameworks, the extent to which these principles are aligned with international human rights standards varies significantly. The role of ijtihad, the interpretation of Qur'anic verses, and the broader socio-political context play a crucial role in shaping the human rights landscape in each country. This study underscores the importance of reinterpreting traditional Islamic principles in a way that promotes both justice and human dignity in modern legal systems.

1. **CONCLUSION**

A This study provides a comparative analysis of the integration of Qur'anic principles into the human rights legal frameworks of Egypt and Indonesia. The findings reveal significant differences in how both countries interpret and implement these principles, despite sharing a common Islamic heritage. In Egypt, the application of Qur'anic teachings within the legal system often faces challenges due to conservative interpretations, particularly concerning gender equality, freedom of expression, and religious freedoms. While the Qur'an advocates for equality and justice, these values are sometimes limited by traditional legal frameworks.On the other hand, Indonesia presents a more flexible approach, balancing Islamic principles with modern democratic values. The country's pluralistic society and its emphasis on human rights allow for a broader interpretation of Qur'anic principles, particularly in areas such as gender equality and freedom of religion. The role of ijtihad in Indonesia has been crucial in adapting Islamic law to contemporary human rights standards, ensuring a more inclusive legal system.

Ultimately, both countries illustrate the complexities of reconciling Islamic teachings with global human rights norms. This study underscores the importance of revisiting traditional interpretations of the Qur'an to better align with contemporary values of justice, equality, and human dignity, ensuring that human rights are respected for all citizens.

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