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Mapping Legal Pluralism in Two Asian Jurisdictions: A Comparative Study of Pakistan and Singapore

Muhammad Asim Rafiq [1], M Abu Bakar Chandia [2] Ali Arshian[3], Ali Istafa[4]

[1] Master of Law, School of Law, Xian Jiaotong (Graduated), China. Email: m.asimrafiq@gmail.com
[2] LL.B. Hons, Punjab University Law College, University of the Punjab, Lahore, Pakistan. Email: abubakarchandia123@gmail.com
[3] LL.B. Hons, Punjab University Law College, University of the Punjab, Lahore, Pakistan. Email: aliarshianjutt@gmail.com
[4] LL.B. Hons, Punjab University Law College, University of the Punjab, Lahore, Pakistan. Email: aliistafa2019@gmail.com

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ABSTRACT

This article makes a comparative analysis of how Pakistan and Singapore manage to navigate in the legal ambit of pluralism within the dual framework of a centralized, common law-based legal system. Pakistan is a deeply-rooted, socially sedimented pluralism formed by Islamic law, ethnicity and informal justice. In contrast, Singapore controls limited pluralism through a technocratic system and highly centralized legal system. By studying both reforms and law-making, the article brings up institutional and ideological distinctions, ranging from the legal disorganization of Pakistan to the naturalization of legitimacy issues in Singapore. It analyzes how, properly handled, legal pluralism has the potential to promote legal innovation, strengthen state legitimacy and promote inclusivity in governance in postcolonial societies.

Corresponding Author's Email: m.asimrafiq@gmail.com

1. Introduction

By definition, legal pluralism refers to the phenomenon in which multiple legal systems, authorities or normative orders co-exist in the framework of a single political or constitutional system(Fabra-Zamora, 2022). While often the subject of postcolonial studies, its practical manifestations differ greatly depending on the state's history of legal tradition, political organization, and identity governance etc. This article examines legal pluralism as a lived and institutionalized phenomenon in Pakistan and Singapore. Providing a comparative analysis of how these two states, both inheritors of the British common law tradition, manage normative diversity within the confines of a centralized legal order. Lawful pluralism is entrenched in extensive diversities of Pakistan society courtesy of religion, ethnicity, tribal blood togetherness, and regional autonomy. The legal system is based on constitutional principles in Islamic, which interacts with the provincial legislation, customary norms (Gul, Ahmad, & Rahman, 2025)(such as baradari) and non-judicial justice (i.e., jirga)(Hakimi, 2024). The legal direction that the country has taken in the postcolonial era has been governed by attempts to consolidate power using religion and language, despite the plural practices that Campbell continues to exercise in everyday life. Subnational legal identity further funneled the Constitution's power for the provinces through the 18th Constitutional Amendment which allocated powers to the provinces (2010)(Shehzad & Afridi).

Pakistan has been through legal pluralism in ways in which the relevance of the inheritance of colonialism have also contributed to the understanding of such a process. The coming in of English common law on the much already existing society pitted at the target the Islamic mores and customary mores in the face of which arose a enduring dualism of law of state and community law and land. The series of constitutional changes culminated in attempts to Islamicize the law amid the realisation of the colonial regimes of governance and accorded a multidimensional order. The colonial heritage in Pakistan crashed into demands to be Asbah in

postcolonial relations, radically, it brought back a destabilized balance as opposed to being subsumed in a centralized technocratic state as in the case of Singapore. Contrarily, at the other end of the spectrum is the highly regulated type of legal pluralism in Singapore, in a statist multiculturalism whose government is technocratic. The laws benefitting the Muslims individually, albeit envisaged by the AMLA, lead to the legal diversity being strongly restrained by administrative integrity and social peace(Saleem, Fatima, & Siddiqui, 2024). The Syariah Court is acting in an environment that is deeply surrounded with the civil legal system and recent legacy in 2024 have continued to streamline its operations with the Family Justice Courts(Nasrul et al., 2024)**.** Beyond religious law, Singaporean governance exhibits functional pluralism, where differentiated regulatory mechanisms, like AI, robotics, and health technology, operate under a unified but flexible administrative logic(Pande & Taeihagh, 2023).

While the technocratic form of pluralism seen in Singapore seems to be working to its benefit in preserving peace and harmony, there are concerns that it may mask and obscure hidden tensions. By subordinating religious law to the imperatives of administrative connectedness, the state risks treating pluralism bureaucratically rather than recognition of normative diversity. This raises questions about whether legal pluralism, when managed too tightly, loses its capacity to provide genuine space for cultural or religious expression. This article is structured in six sections. After the introduction, it examines how legal pluralism has developed in Pakistan and Singapore. Then compares them across four areas: sources of authority, institutional design, identity formation, and governance strategies. It then discusses the structural challenges both countries encounter in balancing pluralism with legal unity and provides specific, practical recommendations. The article concludes by considering the wider implications for comparative constitutionalism and pluralist governance in postcolonial states. Despite increasing research on legal pluralism in post-colonial states, current studies rarely do three things simultaneously: (i) empirically map institutional structures considering recent reforms, (ii) view pluralism as an active governance approach rather than just a descriptive feature, and (iii) link these governance strategies to tangible outcomes for rights, legitimacy, and doctrinal evolution. Many comparative studies stop at simple typologies or rely on outdated data, neglecting how constitutional amendments and administrative reforms actually reshape plural legal systems. This paper addresses that gap by merging doctrinal analysis with institutional mapping of key developments, such as Pakistan's post-2018 provincial jurisprudential changes and Pakistan's 26th Constitutional Amendment (2024), as well as Singapore's AMLA procedural reforms (2024). It tests a three-part comparative framework source of authority, institutional design, and governance strategies. The findings present an empirically based argument highlighting two contrasting governance models: Pakistan's layered, contested pluralism and Singapore's managed, technocratic pluralism and how these models generate different risks and policy needs related to rights and legitimacy. In sum, this paper moves beyond simple typologies to show why state choices about pluralism are significant, both doctrinally and in terms of public accountability.

This study uses a qualitative, comparative-legal approach. We combine doctrinal analysis of constitutions, statutes, and reported decisions with institutional mapping and policy analysis to trace how legal authority is produced and organized in Pakistan and Singapore. Sources include primary legal texts and official reform documents together with the leading secondary literature in the uploaded corpus; close reading and cross-jurisdictional comparison are used to triangulate findings. The comparative framework centers on three dimensions sources of authority, institutional design, and governance strategies and the summary table that follows provides a visual roadmap for the detailed subsections that unpack empirical evidence and normative implications. This design privileges contextual depth and normative clarity over quantitative generalization.

2. Legal Pluralism in Pakistan

Legal pluralism has been a part of the law in Pakistan since the British rule and as the matter of fact it has been one of the changing constitutional identities of the land (not just the heritage of the colonial rule placed there on the Islamic law). Although the formal legal system integrates the Islamic principles into the constitution, in this case, the de-facto scenario will indicate that the normative structures are redundant and are as follows: provincial autonomy, tribalism, familial systems (baradari), informal legal system. This variety of legal practices illustrates a multifaceted pluralism that encompasses constitutional, religious, provincial, and

customary aspects simultaneously. The central point in this conglomeration is the constitutional position of Islam as a source of law and the national identification. The Constitutional articles that fall under 227-231 mandate the consequentiality of the laws to the injections of Islam and the same bodies and organs like the Council of Muslim Ideology, Federal Sharita Court, etc are the constitutional custodians in the entire concept. Nevertheless, Islamic legal thinking is not unitary by any kind of reasoning from an assortment of sectarian interpretations where as well as the reduced customary article of reading forms a traumatizing and even hostile jurisprudence(Hunter, 2024).

That the incorporation of Islam into the system of constitutionality, nevertheless, fails to trickle into the heterogeneity issue on approximate multiple definition of the Islamic jurisprudence as such. Competing sectarian schools, such as the Hanafi, Shafiq's, and Jafari traditions, shape judicial reasoning in different ways, particularly in family and inheritance disputes. Such a lack of required oneness in doctrine does not result in such enforcement of Article 227 being an easy task, where the judges generally have to manage conflicting assertions of religious authenticity and constitutional primacy. This normative diversity is further increased by ethnolinguistic and provincial heterogeneity of Pakistan. The 18 th Constitutional Amendment of 2010 identified most of the power of legislation to the provinces that can now have the capacity to formulate laws regionally(Ali, Qasmi, & Raza, 2023). In turn, the reactions to such important issues as the rights of minorities, the family law and education differ across different provinces(Iqbal et al., 2025). In reference to the case of Sindh, the law culture has been combined with the radical laws that protect the minorities, but other provinces have to deal with more conservative law structures that have been stipulated to act according to local beliefs and religion. The same or such decentralization has bolstered the legal pluralism that was already prevailing in the socio-cultural make up of the Pakistan. Such national disparities between the provinces show that federal decentralization intensified pluralism instead of harmonizing it. Sindh Hindu Marriage Act (2016) made minorities gain recognition of their family rights in Sindh although Punjab opposed the idea referring to cultural and religious sensitiveness. These regional differences show that provincial legal authority does not merely indicate the reality of demography but it serves to strengthen the competing images of justice in a single constitutional order.

Even though the informal and traditional systems of justice are not the focus of the proper legislature, they exist and still shape the societies (especially rural and tribal). Jirga and panchayat systems are informal systems of adjudication of a dispute though not legally written in practice which is dependent on the practice. The systems are mainly a characteristic of deep-personalized kin and familial, patriarchal systems and even though it provides ready-at-hand ways of dispute resolution is of legitimate concern with regards to the question of procedural airiness or rights safeguarding(Khan & Khan, 2024). Courts occasionally intervene to assist in regulating such processes but their longevity has been witness to both the unreachability of the law of the state as well as the social legitimacy that is attributed to institutions of that type in the mind of local communities. The judiciary as well as the academia have been censured among jirgas and panchayats. Criminal acts like the scandalous case of Mukhtar Mai case made the international community rise to issue of gender-based violence in the name of customary justice in parallel forums(Nawaz, 2025). In spite of the occasional declarations by the superior courts in Pakistan that such habits are illegal, it has not been fully enforced. Human rights commentators suggest that the perseverance of such forums is a sign of the state to be able to project believable, convenient justice towards the rural locales. The legal pluralist situation is further complicated as the result of recent development of constitutions. It was altered by the 26th Constitutional Amendment directed at the institutional design of the judiciary by enhancing the impact of provincial courts on examination of federal legal actions(Muhammad, Khan, & Shahid, 2024). Although this would give the spheres more autonomy, the amendment has not only been viewed with jubilation but, more specifically, jurisdictional enterprises that have accompanied the law or federal dictum with Islamic counter biomedical(Aroney, 2024; Muhammad & Ali, 2025).

Still, this judicial devolution is associated with certain threats. Amendment the 26th has been praised to have brought about an independentness but it has led to the danger of various constitutions among regional and central courts. Critics advise that in the absence of appropriate procedural mechanisms established to relish such differences, Pakistan will suffer a deficit in legal continuity specifically an area to deal with sensitive matters like law against blasphemy, legalting

of the minor and women law. Uncontrolled decentralization can dissolve the constitutional order further instead of pushing the U.S. towards pluralism. Pakistan is a legal pluralist in a number of levels such as constitutional, religious, customary, and provincial ones. It articulates the vitality of unity amid multiplicity without targeting the state to retain conglomerate oneness even with regard to normative difference. The problems of legal unification such as the rights of the minorities, gender justice and judicial consistency accompanying such a pluralism, however, however strong it might be, have issues to answer to. Nevertheless, it is still a significant characteristic of a legal and political building of the Pakistani society.

3. Legal Pluralism in Singapore

We are getting at the fact that Singapore is a sort of a decentralized but limited coverage legal pluralism that is echoed with a one and technocratic state apparatus. These variations are a consequence of the institute of pluralism, which is not as much attained by creating a legal pluralism rooted on the sameity of religious and ethnic identity as with the case of Pakistan but through the institute of institutional containment, proactive regulation and procedural integration as with the case of Singapore. Despite the recognizance of a certain level of legal diversity in terms of Muslim personal law by the state, these have been integrated into a government system that is beneficial in terms of ensuring that there is social tranquility, good governance and national solidarity. Courts have remedied the need for a major formal articulation of legal pluralism within the Singaporean appeasement to the rule of law by formulating the Administration of Muslim Law Act (AMLA) which was later amended to the changing socio-legal milieu(Pasuni, 2022). Under AMLA, the Syariah Court has the right to adjudicate issues concerning the Muslim marriage, divorce, inheritance, and religious observance. They are however vastly dissimilar to the civil law but can be aligned procedurally by the contrivance of the ministry of Culture, Community and Youth, and Islamic Religious Council of Singapore(Bin Md Aris, 2022). A significant revision of AMLA is planned in 2024 to enhance digital access, efficiency of the process and institutional capacity of the Syariah Court(Shoukat et al., 2025). These reforms had such measures as the introduction of the digital case management system, availability of legal aid and harmonization of the process with the Family Justice Courts. Importantly, they did not change the nature of the Islamic law, however, they were worried about the compliance with the use of modern tools to institutionalize. This is paralleled by a larger area of de facto trend in the legal system of Singapore: Detailing the heterogeneous zones of pluralism are taken in addition to a legal system of regulatory confidence, predictability, and administrative respectively.

One can investigate just how unusual Singapore selects its model which compares the Islamic legal institutions in Pakistan. In Pakistan, where the constitutional primacy of the Islamic law is established in the Federal Sharita Court capacity of Malaysia, a similar case occurs in Singapore where the institutionalization of the Syariah law is established in the functional but secondary niche or area of the administrative state. This represents a basic point of departure: in the case of Pakistan the Islamic law is a constitutional source of legitimacy; in the case of Singapore the Islamic law is an accommodational source of specific community but strictly defence of state. Beyond the religious legislation, Singapore indicates a policy of regulation, on the basis of which various methods of the legal treatment apply in the new fields of artificial intelligence, biomedical ethics, and platform governance(John & Panachakel, 2024). Such pluralism is not applicable in the classical sense of normative since it is not made up of multiplicity of moral orders or cultural claims. It is rather a manifestation of functional differentiation under which the risk summative and moral requirement of each section of the policy are contained in state law. Such practices show how the legal pluralism in Singapore is controlled not by competing authorities but through the central legal responsiveness in policy silos. However, some scholars consider that the functional differentiation of the technological and biomedical fields in Singapore can be termed as the legal pluralism in the classical meaning. Compared to multiple normative orders in Pakistan, the legal system of Singapore is not recognized to exist with competing sources of power, the regulatory methodologies are diversified, however in a unitary manner. This leads back to the issue that with such a governance being referred as plural make us exaggerate the issue of diversity when it is at most merely a question of administrative agility and is therefore, not normative plurality.

The most important facilitator to this model is the level of public trust to the institutions of law and regulation. Experimental investigations carried out by 2021-2023 express that

coalition to pluralist law governance which comprise Syariah law and differentiated technological norms is commonly attached to the feeling of citizens to the government of authoritative, transparent and participatory belief toward the persons and the corporate judgments(Yilmaz & Sokolova-Shipoli, 2024). This faith has been developed by the government actively through legal education, continuous open channel of communication and participation of these consultations to those regions where religious or ethical sense of sensitivity may exist. The longevity of this model, however, depends a lot on the viability of the further legitimacy of state institutions. Public trust, although any moment high, can not set be assumed becoming permanent. If economic inequality or political contestation were to undermine confidence in state governance, Singapore's small amount of autonomous religious or cultural legal expression may cause a source of grievance. In that sense, pluralism in Singapore remains conditional on state legitimacy, but in Pakistan, pluralism continues anything the state approvals as its practice because it has been rooted deep into society. In addition, AMLA is complemented by the Maintenance of Religious Harmony Act in Singapore which has a legal framework which defines any religious conflict as prestigious and recon. This ensures that institutionalization of pluralism does not occur but that pluralism is also verbally administered to bigger state undertakings in exchange of diversity. Unlike simple and plain societies that remain dependent on the tendencies of judicial front loading and federal autonomy in order to employ the diversities, Singapore uses pre-legislative consultation and moderate legal authority in a bid to establish pluralism.

This is a prevention form of governance strategy compared to a reactive adjudicative based form of governance in Pakistan. Pakistan courts have been occasionally requested to solve any dispute that has gone beyond their control and turned into constitutional or political crises. In comparison, Singapore takes the anticipatory regulation focus much higher in preventing the occurrence of the legal conflicts in the first place. Although this approach has been successful in preserving stability, this approach is criticized by some as it might act as an inhibitor of organic legal evolution and a method of hindering the type of normative debate which sustenance pluralistic societies. Overall, both of the two traits of administration centralism and normative restraint define how Singapore has responded to legal pluralism. It does not ensure diversity by autonomy based on law, but through institutional design. Pluralism is not made an issue to the state authority but rather a factor about strategic governmental management adjusted to maintain peace, facilitate sector adaptation and legal legitimacy of a multi-religious, multi-ethnic state.

4. Comparative Analysis: Pluralism Across Two Legal Orders

Table 1: Summary comparison of legal pluralism in Pakistan and Singapore across authority, institutions, identity, governance, and primary policy priorities.

4.1. Sources of legal authority

In Pakistan, legal authority is multi-sourced and contested. The Constitution establishes Islam as the foundational source of law (Article 227), while simultaneously recognizing provincial legislative authority, customary law, and federal supremacy. This coexistence of religious, constitutional, provincial, and tribal authority produces a highly layered legal environment(Shakoor Chandio, Tunio, & Korai, 2024). Judicial interpretation often seeks reconciliation among these sources; yet, normative dissonance persists, particularly where customary practices clash with constitutional rights. In contrast, Singapore’s legal authority is formally unitary and centralized. While AMLA creates a distinct legal track for Muslim personal law, it does not confer autonomous normative power. Instead, it embeds religious law within the logic of state administration. Syariah law is procedurally regulated and structurally integrated into the broader legal system, reflecting a bounded pluralism rather than full normative autonomy(Jailani, 2023). State law remains the exclusive source of legal authority, even where religious norms apply. The contrast between these two models illustrates how the source of legal authority shapes the very meaning of pluralism. Pakistan’s bottom-up pluralism is grounded in competing social and religious legitimacies that the state cannot fully absorb. In contrast, Singapore’s top-down pluralism is designed and supervised by the state, with religious and cultural expressions permitted only within parameters fixed by central authority. This means that while Pakistan struggles with reconciling diversity, Singapore controls diversity by never allowing it to escape the boundaries of state law. Such a divergence raises a theoretical question: does legal pluralism require genuine autonomy of competing normative orders, or can it survive as a tightly managed extension of state sovereignty?

4.2. Institutional Architecture

The institutional pluralism in Pakistan indicates the division of jurisdiction. Other courts such as Federal Sharita Court, Council of Islamic Ideology, and provincial high courts coexist with informal justice forums (jirgas, panchayats) which tends to lead to overlaps or contradictory jurisdictions of the law(Ishfaq et al., 2024). The 26 the Constitutional Amendment (2024) with the purpose to strengthen the provincial courts has led to more conflict over the areas covered by the laws especially those connect federal to Islamic areas that have their overlap(Muhammad & Ali, 2025). The lack of antithesis of institutional order in Pakistan in which the Federal Sharita Court functions is also tainted by literally dozens of turf wars between the Federal Sharita Court and the Supreme Court most of them touching an issue of rights of the constitution verses injunctions of religion. As an example, the reform of legislation is most of the time at loggerheads with the extreme activism of the higher judiciary in cases connected with the blasphemy and the hudood cases which have been tackled by the judiciary over decades since then and with the international human rights conventions. Such multiplicity of fora leads to a multiplicity problem; a multiplicity problem that gives rise to uncertainty, among the litigants and legislators who a must design the reasonable laws. By contrast, in Singapore, such clashes are precluded by the system as the Syariah Court is in all instances functionally subordinate to the central judiciary. However, critics amongst these are of view that this occurs at the cost of a rich body of law as the space of interpretation for Syariah jurisprudence is inhibited by the overriding goal of administrative integration. Connectedness and regulatory integration, in contrast, is manifested through the institutions in Singapore. Syariah Court is a court that would work under the AMLA but procedurally would liaise with the Family Justice Courts. Digital systems were introduced with reforms in 2024 under which all dispute resolution timelines were aligned making experiences equal without judicial disaggregation(Gregory, 2024). The connections with the legal infrastructure ought to limit institutional pluralism and balance it out accordingly.

4.3. Identity and Legal Recognition

Even in Pakistan, legal pluralism is structure interwoven with ethnic, sectarian and linguistic identities. Such laws in provinces tend to be a response to the population composition e.g. the minority rights laws of Sindh is unlike the tighter-fisted stance in Punjab(Falki & Bano, 2019). Moreover, the law is also applied in defending and oppressing identity claims, based on political condition. The 2025 National Commission of Minority Rights Bill connects the institutional recognition initiative, however, there is a doubt on whether it will enforce the minority rights. The place of Singapore frame in the state ideology of managed multiculturalism where race and religion are known via legislation but are politically depoliticized. AMLA and the Maintenance of Religious Harmony Act provide organized platforms of expressing identity, and yet they lack freedom of encounter with state control(Keong, 2013; Zakaria, 2025). What has been born is an administratively delimiting yet legally incorporating type of pluralism of identity, more secure, but livelier than the consecratory model in Pakistan.

A more comparative analysis also shows how identity in Pakistan is politicized while in Singapore it gets depoliticized. From a particular political perspective, law in Pakistan is a battleground for sectarian competition and nationalistic claims, and provincial law is a mirror for the identity politics. This also contributes to a fragile legal context where minority protection is usually taken as the ransom of politics. At Singapore identity is similarly recognized and closely maintained outside of mobilization: As much as managed multiculturalism tends to stabilize identity, it can also depoliticalize the identity created to the extent of where a positive voice of participation may seem denied the center. Therefore, unlike Singapore which takes the risk of cultural standstill with overmanagement, democratization of Pakistan can also result in the litigation of law.

4.4. Governance Strategy and Legal Pluralism

Changing coalitions in politics, judicial activism, informality of purported law inform indication reach Pakistan and make its pluralism adaptive but weak. It has a predisposition to oscillation between focalized religiosity which gives a feeling of cohesiveness and decentralization of power to constituencies in order to appease the smaller provinces and denominations. Legal pluralism is an instrument and a threat to national unity that includes unceasing intermediation(Ishfaq et al., 2024). Singapore is increasingly handling pluralism as regulating a project. Pluralism is not discussed in terms of constitutional dilemma but rather as a sectoral regulatory law that can be seen in the various legal treatment of technology, religion, and

ethics(Neo, 2020). Diversity and pluralism are controlled by the state through design, but this design is not by delegation of power laid down by law. The result of this, is a technocratic, risk sensitive and institutionally contingent pluralism. These two radically different strategies are manifestations of distinct political principles of governance, too. The country of pluralism in Pakistan flourishes by the manner that its ability to regulate it is feeble and criticism on its rule is posed; it is strong yet uncertain. Singapore has singularism being mechanized since the governance technology is efficient yet bounded. That is a big challenge; with the evolution of societies, will such models evolve?. Pakistan can perhaps go down the road of possible disintegration by not institutionalizing constitutional coordination mechanisms and Singapore may contend with new cultural demands of legitimacy failure by tight contained organizational model. The comparative constitutionalism obligation serves as a reminder that pluralism is not a frozen matter, where it can be placed in a freezer - it must always be repackaged of its own between authority, identity and governance.

Table 1: Summary comparison of legal pluralism in Pakistan and Singapore across authority, institutions, identity, governance, and primary policy priorities.

Dimension	Pakistan	Singapore	Key implication
Sources of authority	Multi-sourced: constitutional Islam (Art.227), Federal Shariat Court, provincial legislation, customary norms (jirgas, biraderi).	Unitary/state-centric: state law is primary; AMLA creates a procedural niche for Syariah law but no autonomous normative power.	Pakistan = bottom-up contested legitimacy; Singapore = top-down managed legitimacy. Mapping+Legal+Pluralism+in+Two+…
Institutional design	Fragmented institutions (Federal Shariat Court, Council of Islamic Ideology, provincial courts, informal fora) with jurisdictional overlap; 26th Amendment increases provincial judicial role.	Coherent, integrated institutions; Syariah Court procedurally harmonized with Family Justice Courts; 2024 reforms focus on digital/procedural alignment.	Fragmentation vs. functional integration; risk of inconsistent jurisprudence in Pakistan. Mapping+Legal+Pluralism+in+Two+…
Identity & recognition	Law tied to ethnic/sectarian identities; provincial divergence (e.g., Sindh vs Punjab); identity often politicized.	Managed multiculturalism: race/religion recognised but depoliticised; identity expression insulated by administrative rules (AMLA, MRHA).	Pakistan: dynamic but politicised identity law; Singapore: depoliticised but limited participatory voice. Mapping+Legal+Pluralism+in+Two+…
Governance strategy	Adaptive, reactive: oscillates between centralising Islam and devolving authority; reliance on courts to adjudicate conflicts.	Preventive, technocratic: pluralism treated as sectoral/regulatory design (anticipatory regulation, administrative containment).	Pakistan risks fragmentation; Singapore risks ossification and representational limits. Mapping+Legal+Pluralism+in+Two+…
Primary challenges	Jurisdictional tension, informality (jirgas), politicisation of pluralism, gender/minority rights vulnerabilities.	Limited interpretive space for Syariah doctrine, representational limits, over-containment, limited transparency in reform processes.	Different problems — coherence vs. legitimacy. Mapping+Legal+Pluralism+in+Two+…
Quick policy priority	Constitutional coordination + regulated hybrid community justice + empowered minority commission.	Expand participatory consultations, publish Syariah precedents, improve multilingual access and legal aid.	Contextual, jurisdiction-specific reforms recommended. Mapping+Legal+Pluralism+in+Two+…

5. Challenges in Reconciling Legal Pluralism

Legal pluralism in Pakistan and Singapore presents other dilemmas not only based on the law structure of the nation but on the institutional and political /performances of the two countries that determine the manner with which they control the diverse. Even though each jurisdiction is distinct in their model of pluralism, both still have a dilemma as far as regulation of normative pluralism and constitutional unity and institutional unity and capacity to be palatable to the masses.

5.1. Pakistan: Segmentation, Informality, and Jurisdictional Tension

The basic challenge of the land of Pakistan appears to be the erosion of the strain between normative decentralization and constitutional centralism. Although the Constitution of the country stipulates Islam as unifiers of law, what has been happening in actual law practice has presented significant divisions between various jurisdiction of the law between federal laws and provincial laws, between written law and custom practice, formal courts and informal dispute resolution forums. This interference of the laws often results in constitutions of laws that contradict it particularly in individual status, minority and land rights. It is possible that these strains are most evident in the implementation of the laws of blasphemy and which demonstrates the clashes of different levels of the Pakistan pluralist system. The federal laws criminalize blasphemy but they are really harshly punished but in case of enforcement of the law, it is done by the provincial police or the local courts or at least the pressure of the community itself to introduce any changes to the crux of the very scenario. Formal actors sometimes, e.g., jirgas or religious leaders, intercede to the formal system to provide extra-legal punishments that trump constitutional guarantees. Therefore, in Pakistan, legal pluralism has even intensified legal ambiguity and antagonism as opposed to giving rise to several valid channels of administration.

The new judgment in the twenty-sixth amendment to the Constitution (2024) brings in increased independence of the hands of justice only at the province and at the same time it makes us apprehensive about the inconsistency and possibility of increased controversies about what would be the case when federal directives or Islamic jurisprudence are concerned and the issue of local government legalities. Additionally, the informal justice mechanisms like jirgas and panchayats are still outside the regulation of the state and they frequently support patriarchal and exclusionary standards. Yet these forums that are easily accessible to most of the public often end up disempowering constitutional protections offered especially to women and minorities. What the Hudood Ordinances further demonstrate is the risk associated with the pluralist subdivision. Their treatment of women and minorities is widely disputed because, in the beginning, they were included in the Islamization program launched by General Zia-ul-Haqq. The province high courts have in some cases adopted a restricted interpretation of such ordinances to soften the problems and maximum results of such ordinances and the Federal Sharita Court has still been clamoring to see that such ordinances attain shape and order in accordance with the Canadian injunctions. The Pakistani pluralism embodied through this duplicity indicates that pluralism in the Pakistani nation is in most cases a battleground on progressive versus conservative comprehensions which create termination in the jurisdiction instead of clarity on the legislation.

The other challenge that has been persisting unless the political actors instrumentalize legal pluralism. Religious parties and provincial elites tend to utilize the pluralist logics as the manner of obstructing the federal reforms or progressive bills. This politicization will merely put death to the normative homogeneity of the law system and most importantly compromise the extent of trust the people have in the constitutional protections. The other dimension of politicizing is that the federal/provincial relations are to be bargaining using the concept of religious pluralism. Instead, policy parties resort to religious or sectarian rhetoric whereby they are contesting central reforms in order to appear to safeguard self-governing communities. This has been very clear in controversies surrounding bills on minority rights or the reforming of several curriculums where provincial resistance has been seeking to assert itself as reference to the theory of legal pluralism not as to the principle of a constitutional talking, but as a point of provincial federal intrusion. By this degree, pluralism is turned into a means of political manipulation to less righteous ends, and gaining and retaining elite power.

5.2. Singapore: Centralization, Representational Limits, and Legal Containment

The other form of challenge is the one against the model of bounded legal pluralism in Singapore. Its institutional efficiency is bestowed by its centralized government structure at the cost of a sense of incompromising to a sense of institutional legitimacy in minorities. Although the AMLA and the Syariah Court offer an appreciation of the Islamic personal law, they offer a limited measure of a highly-registered system, which constrain the communities in formulating the law on substantive issued. The 2024 procedural reforms improved administrative access but did not address deeper concerns over interpretive space or doctrinal evolution within Syariah jurisprudence(Agustar & Zein, 2024).

Critics of the AMLA reforms have alleged that by only taking steps to modernize procedural matters, the government has been avoiding confronting substantive questions of Islamic jurisprudence. For example, matters of inheritance law and women's rights under the Syariah Court continue to be governed by interpretations of it which some groups in the community consider to be outdated. But for the state to stop the debate of doctrine, it runs the risk of relegating Islamic law to a symbolic formula devoid of its power to grow organically in the Muslim community. This stands in stark contrast to Pakistan where doctrinal contestation is constant and is often destabilizing. Also, the Singapore strategy towards pluralism is based on the strong faith in the state regulation. This dependence can either be diluted with a change in social-political situation, or the loss of a social trust due to perceived unfairness, e.g. in the imposition or representation. Furthermore, another question of whether the current laws can serve as a fair, consultative and context sensitive regulation arises due to sectoral regulatory pluralism that has been witnessed in Singapore in the form of differentiated regulations on the new technologies. Challenges of trust of the population also involve basic concealed disharmony among communities. Although the general rates of trust are high based on surveys, there have been dissenting opinion that some aspects have been mismanaged based on minority perspectives as opposed to being given serious consideration. In another instance, the Tamils communities, as well as the Indian Muslims may sometimes complain that their concerns get subjugated under the more broad Malay-Muslim umbrellas when dealing with the states. This reflects on how a centralized model (however effective), can unwillingly push minor constituents that do not fall well into the major administrations into the periphery.

And finally, the legal development processes do not exude much transparency particularly in talks about the religious and cultural legislation respect has invaded criticism on inclusiveness and responsiveness. The state itself may experience the increased difficulty in taking control as the legal requirements are shifting up to a more inter-connected and educated world and brings it much easier to trigger calls upward to greater communal legal voice. Another challenge is the insufficiency of transparency of the pluralist rule in Singapore. The decision making process which does exist in the background of reforms through AMLA or the Act of Maintenance of Religious Harmony is usually a failed process with consultations undertaken through state controlled forums. Although this prevents conflict, this has the same impact of damaging grassroots involvement and suppression of any voice of dissent. The fact that, due to Singapore being both more and more diverse and digitally connected, an open debate is missing, may foster the frustrations that will do nothing to make the system more stable, which it is actually supposed to defend. Therefore, it does not face the same problem of decentralization in Singapore as in Pakistan but faces the dangers of over containment when it comes to disengagement.

6. Recommendations for Managing Legal Pluralism Effectively

It also proposes jurisdiction related legal and institutional modifications that would not only manage the pluralism in a standardized manner but also would not breach the constitutional, religious as well as cultural value of the two countries i.e. Pakistan and Singapore. The intention behind this is not meant to homogenize the legal systems but rather to foster internal coordination, access to justice in addition to greater levels of confidence of people in plural legal frameworks.

6.1. Pakistan: From Fragmentation to Constitutional Coordination

The provincial autonomy, Islamic jurisprudence, and customary authority define the rule by law of pluralist system of governance in Pakistan. The subsequent recommendations are supposed to get around the issue of questions of jurisdictional reach, and hence offer more institutional legitimacy and secured constitutional armaments across the different courts.

6.2. Enact a Federal–Provincial Coordination Law on Plural Jurisdiction

Federal-Provincial Law Harmonization Actaminegamoore and Pearn (2012). by Parliament ought to constitute a clear account of the application procedure of the Islamic, provincial, and customary laws on the regions of their intermeeting. That kind of law would enable Supreme Court to embrace interpretative procedures in a bid to find solutions to the legal power conflicts especially on the family law, education and minority rights. Additionally, there should be a coordination committee that consists of federal and provincial legal officers who will meet twice in a year to oversee any aspect of conflict that comes up between jurisdictions. Political good will is however what determines the success of such a framework. As has been experienced in the history of Pakistan, even well-constructed coordination mechanisms have collapsed under the press of politics or judicial activists. It would seek political consensus that a harmonization act then resembles another phantom, as opposed to what a harmonization acts was intended to be, an instrument of confronting competing jurisdictions. According to a warning by scholars, in the event that the federal and provincial governments are not interested in cooperative federalism, such kinds of reforms might only increase the tensions but not help solve these issues.

6.3. Institutionalizing Hybrid Community Justice with State Oversight

Provincial assemblies are to provide legal frameworks to register and regulate community forums for justice delivery such as jirga and panchayats. Such forums ought to act under chartered licenses and members would even be called to undergo compulsory education in the domains of the human rights, gender equality, and due process. What is more relevant is that the institution of the ombudsperson that oversees the decisions of the provinces and controls complaints should be provided in all these provinces in line with the provisions of the informal justice benchmarks within the confines of the Constitution. But always there exists the impending rivalry in this solution between the traditional structures and rights-based approaches against which to argue. As a matter of fact, community leaders oppose this exotic domination as they view these effort to inculcate standards as strategies to interfere with their independence. Otherwise the establishment of the State may derail the credibility of the jirgas and panchayats before the local community and make them move to the margins. As a result, the regulation must balance out between the necessity to time a community authority and the desires of constitutional safeguards to shape up an environment in which the informal justice may be reformed, rather than crushed.

6.4. Operationalize the National Commission for Minority Rights with Legal Powers

Some form of judicial authority should be vested in the Minority Commission of 2025 so it may initiate investigations and provide any legislature or judicial actions in instances where the minorities are challenged by discrimination which is subject to different legal systems. They are suggested to have regional authorities in each province with quota allocated to minority women, religious scholars, and constitutional lawyers. The Commission is also supposed to release reports on an annual basis on the impact of the plural legal system in relation to minority rights and access to justice as well as equal protection under the law. Enabling the Minority Commission will involve not just power over the law but over the finances and politics too. The Commission is in danger of growing into a token growth since it lacks conduction against overtures of partisans. The South Asian experiences show that the minority commissions will fail in most instances when their recommendations are not heeded and in cases when they do not have such powers to enforce it. Pakistan should therefore ensure that the Commission is better placed to make civil contributions in the law making and judicial procedures.

6.5. Launch a Legal Pluralism and Rights Awareness Initiative

Ministry of Law and Justice will act in collusion with the Bar Councils and law schools in the designing of programmed legal awareness to the people in the good regional languages. Breaking in activities: mobile legal clinics and local helplines should be initiated to ensure that the citizens are familiar with the route they take to complexities of seeking formal, customary and/or Islamic informed legal means. This takeover would instill a lot of confidence among the populace, as well as create less forum shopping and also enable litigants to make sound judgments about the legal forums. As well the public awareness efforts should cross language and literacy barriers and trust problems. The institutions of villagers are not ready to access traditional legal interventions and the lack of belief in state orientated initiatives is a widespread practice. To ensure the campaigns are fruitful, it needs to collaborate with the local civil society whose actors in the ground are legitimate. Otherwise, state-centered attempts well can be

correctly described as an elitism and therefore even more alienating constitutional law to the experience.

6.6. Singapore: Enhancing Participation Within Institutional Boundaries

Singapore pluralism is an efficient and control system by the state but to deliver accountability and responsiveness over the long run, it ought to expand the interpretative space, consultation with the people, and availability to the people.

6.7. Empower the Syariah Court to Publish Precedents and Legal Commentary

Syariah Court ought to be mandated in spreading written opinions comprising of doctrine so as to establish a ready body of jurisprudentia to guide both of the litigant and prospective judges. Some of the measures that can be used in controlling the process are the involvement of a review board of Syariah scholars and civil court judges, so that they would ensure that their reasoning is in balance with Islamic teachings, and even with national legal rules. Doctoring published precedents would also increase the doctrinal enrichment. Currently, the jurisprudence of Syariah in Singapore is a scattered disconnected one, devoid of any sort of coherent body of case law that can be voted to a litigant or a jurist. Transparency in reasoning would not only improve the consistency but Islamic law would also be developed in dialogue with both international and international debates like the issues of gender equality, inheritance and family law. This would render the community having a stronger sense of ownership over the legal developments, strengthening the trust of institutions

6.8. Create Structured Community Consultations for AMLA Reforms

The Ministry of Culture, Community and Youth (MCCY) should organize a series of round table meetings prior to making any amendment to AMLA which would have Muslim legal professionals, women social groups, youth councils as well as religious phenomenon which are part of these groups. A consultative process of white papering would be more democratic and would mitigate chances of having rejection of the development of the Syariah legal practices. Controlled round tables are not enough, however, it takes meaningful consultation. This has been observed by the civil society organizations in a society where state consultations are tightly organized and there is no room to express any dissenting or critical views. To develop mixed legitimacy, the government ought to allow more voices, those of youth activists and independent scholars to influence AMLA reforms. This inclusiveness would ensure that the impression that pluralism is run top-down without serious contributions of the most concerned individuals does not exist.

6.9. Establish a Legal Pluralism Policy Unit within the Ministry of Law

Second, a specialist Legal Pluralism Unit should be set up, whose role, among other things, would be to review those areas where Singapore's sectoral jurisprudence may cross the divide with religious morality or secular ethics (e.g. biotechnology, AI, end-of-life care). Such a unit should be able to conduct applicable legal impact analysis across sectors and advice on the fine-tuning of legislation to achieve a proper and sensitive balance between regulation and social sensitivities. Finally, a specialized unit would place Singapore in the leading edge in comparative governance of the law. As throughout the world face new pluralist issues profitable impacting upon emerging bio and expertise industries, Singapore may once again function as a version for innovation known as driving paring with cultural sensitivities within a multi-cultural framework. However, proponents of such procedure would arguably be accused of even greater bureaucracy on this front, serving to compromise the pluralistic ideal into a technical problem. To share it, the unit is advised to pursue everything possible to engage the broad stakeholders and consideration of ethical deliberation as part of the very legal formulation.

6.10. Expand Multilingual Access and Legal Aid for Plural Legal Systems

The Syariah Court services must be made extensively in English, Malay, Tamil and even through online submission and directions. Community legal clinics should also operate in tandem with the various legal aspects in which legal aid programs should be simplified in an attempt to make them more accessible but to reach more people. Government intervention AI-based translation systems and case guidance technologies can also be invested into to help peace litigants (i.e., poor and old people) to work through a complex procedure. Making the coverage larger in other languages is of special importance in the digitalization of the laws in Singapore. However, unless a number of languages is available, low income litigants, or the older generation, will be sidelined by the same reforms that will supposedly lead to an increase in efficiency. The

availability of the legal support must be culturally sensitive bearing in mind that the majority of the conflict problems consist not only of a legal but cultural and religious side to the problem. Legal aid should be utilized more liberally in the law to make pluralism spectrum in Singapore an unquestionable one. These recommendations do not circumvent the political, legal culture of any jurisdiction, legal pluralism should not be limited towards the legal viability alone and be socially acceptable, morally engaging and entrepreneurial. Pluralism itself can never be presumed a legal anomaly yet it ought to be thought of as a constitutional prerequisite which must be taken into account during a conscious and comprehensive legal fabrication.

7. Conclusion

Legal pluralism is not one of the puzzle bits or a limericks array in the threshold of traditionalism, but it is a titanic phenomenon of the present day legal systems and even more in the postcolonial nations that are clingy about their lush social, religious and institutional histories. However, this paper attempts to reflect on how Pakistan and Singapore (both ex-British colonies) have reacted to this legal pluralism differently. Moreover, the laws of religious constitutionality can weakenpachtieu philosophical reflections in the centre-stage principles of the Pakistani context would offer the reader with the presentation of dynamic and diffusive pluralism involving the interacting indicators of provincial pluralism as well as sustainability of informal justice structures. On the contrary, Singaporean pluralism has been constrained and technocratic, with few normative spaces to be explored given the centralized legal system in which their limited normative space is tightly regulated. Comparative analysis identified that under bigger issues of governance, identity and legal legitimacy, pluralism in these countries is under the umbrella. The necessity of bringing together different sources of the law and the different localities in the country will present a challenge to Pakistan with regards to challenging the Constitution; whereas the integration dangers and lack of representation in the pluralist regions will be an issue for Singapore. The two jurisdictions have been successful in regard to the area of pluralism's advancements, but have failed to fully succeed on either price of jurisdictional repetition, political floats, or procedural barriers.

The biggest lesson to draw out of this study is based on the principle, however, that legal pluralism provides no threat to the state or the cohesiveness of the law. When our plugurations of pluralism are appropriately placed, pluralism may turn out as an instrument of adaptive legitimacy, even more to the point, it offers an instrument through which legal regimes may and are in national touch with plurality of lived conditions as real in the process, in flavor and sense alike. It is just a matter of ensuring that the plural regimes are transparent and open besides being well structured and representative and not hard, rigid and broken. In the Pakistani but not Singaporean state experience, two quite different risks of pluralism are identified. In the case of Pakistan, fragmentation is a risk in that there are legal overlaps that generate uncertainty, politicization, and marginalization. Heimer’s warning about Ossification plays itself out in Singapore: if pluralism within Singapore, which holds established pluralistic values within its community is in one sense of the state, then this ends up choking the life out of welfare needs that evolve. Despite the fact that pluralism cannot be right or wrong in terms of its connection to the state due to institutional arrangements, openness and flexibility of institutions, both are of the view that pluralism can be stabilizing, not destabilizing. Here in the case of Pakistan, this is by constitutional dampening of the coordination and the traditional local law. With Singapore example, it has to do with augmenting its, participatory legitimacy without interfering with efficiency within the institutions. Both cases do not merely concern this pluralism of the law but the possibility inherent in the state of administering the diverse other law in guiding the state honestly, justly and predictably.

Pluralism in view concerning the aspect of constitution, this study would be proposing the concept that pluralism should never be considered the state of legality coexistence; but could also be perceived as the postcolonial constitutional state. States like Pakistan and Singapore are not supposed to eliminate diversity reasons being that they are only permitted to shape and structure them. What is challenging in that matter is the balance between pluralism on the one hand and the other one on coherence. In Pakistan it means that there is need to pursue constitutional coordination but stood against politicization of the religious leadership. In view of the Singapore context, it means empowering the aspect of participatory legitimacy and being lean. Lastly, pluralism within the law framework in Asia is certain to increase and expand. The structural patterns with fragmentations and centralized ones will have no chances, are majestic

and discrete due to enhanced complexity and integrations. It is the beauty of pluralism which resides on the evolutional phenomena, so as to effectively challenge, it without losing its coherence. Pakistan and Singapore are so different that each of these countries proves that question to be posed that, it does not ask the extent to which pluralism can be handled correctly but the management can be made to be objective, accommodating and durable.

References

Agustar, A., & Zein, A. (2024). The Application of Aspects of Islamic Family Law to the Muslim Minority in Singapore: A Literature Review. *International Journal of Social Science and Religion (IJSSR)*, 23-38. https://doi.org/https://doi.org/10.53639/ijssr.v5i1.206

Ali, Q., Qasmi, S. U., & Raza, K. (2023). Opportunities and Challenges for the Provinces after the Eighteenth Amendment. *Pakistan Social Sciences Review*, *7*(3), 1013-1024.

Aroney, N. (2024). Courts In Federal Systems: Federalism Disputes, Interpretive Modalities And Scales Of Political Salience. *Interpretive Modalities And Scales Of Political Salience (October 18, 2024)*. https://doi.org/https://doi.org/10.2139/ssrn.4992506

Bin Md Aris, M. M. (2022). When Dispute Threatens Harmony in the Public Sphere: Discerning the Dynamics of State-Religion Relation with Particular Reference to Singapore's Muslim Scholars.

Fabra-Zamora, J. L. (2022). The conceptual problems arising from legal pluralism. *Canadian Journal of Law and Society/La Revue Canadienne Droit et Société*, *37*(1), 155-175. https://doi.org/https://doi.org/10.1017/cls.2021.39

Falki, S. M., & Bano, D. S. (2019). New Ethnic identity: role of Religion and State of identity in Pakistan. *The Journal of Political Science (JPS)*, *37*(1), 143-166.

Gregory, J. (2024). Legal Implementation Guide For Cross-border Paperless Trade.

Gul, S., Ahmad, R., & Rahman, S. U. (2025). Constitutional Dualities: Reconciling Islamic Normativity with Common Law Principles in Hybrid Legal Systems. *Indus Journal of Social Sciences*, *3*(2), 674-693. https://doi.org/https://doi.org/10.59075/ijss.v3i2.1501

Hakimi, B. (2024). Factors of informal justice in Afghanistan.

Hunter, M. F. (2024). *Contextualising Zia-ul-Haq's Islamisation of Pakistan (1977-88) and its impact on'non-Muslims' in the thought of Maududi and British colonialism* The University of St Andrews].

Iqbal, S. A., Raza, M. A., Ahmad, F., & Hussain, R. (2025). FEDERALISM IN PAKISTAN: CHALLENGES, REFORMS, AND THE QUEST FOR POLITICAL STABILITY. *Policy Journal of Social Science Review*, *3*(5), 136-152.

Ishfaq, M., Yasin, S., Riaz, M., & Riaz, K. (2024). Navigating legal pluralism: A comparative analysis of Islamic law and secular legal systems in Pakistan. *International Journal of Social Welfare and Family Law*, *1*(2), 01-17. https://doi.org/https://doi.org/10.62951/ijsw.v1i2.16

Jailani, A. (2023). Muslim law. *Singapore Academy of Law Annual Review of Singapore Cases*, *24*, 767-785.

John, A. M., & Panachakel, J. T. (2024). Navigating AI policy landscapes: Insights into human rights considerations across IEEE regions. 2024 IEEE 12th Region 10 Humanitarian Technology Conference (R10-HTC),

Keong, C. S. (2013). Multiculturalism in Singapore-the way to a harmonious society. *SAcLJ*, *25*, 84.

Khan, S., & Khan, A. A. (2024). Jirga as a Mechanism of Dispute Resolution: An Evaluation in the Eyes of Islamic Principles and Legal Challenges in Pakistan. *Indus Journal of Law and Social Sciences*, *3*(1), 1-11. https://doi.org/https://doi.org/10.70540/ijlss.2023(II-I).01

Muhammad, A., Khan, U., & Shahid, A. (2024). The Intersection of Legal Reforms and Judicial Crisis: A Study of Pakistan's 26th Constitutional Amendment and the Black Day for Judiciary. *The Critical Review of Social Sciences Studies*, *2*(2), 1248-1267.

Muhammad, M., & Ali, M. S. (2025). The 26th Amendment to the Constitution of Pakistan: Implications for Judicial Independence. *Social Science Review Archives*, *3*(2), 148-153. https://doi.org/https://doi.org/10.70670/sra.v3i2.602

Nasrul, M. A. D., Alihan, S. A. A., Hamid, A. A. A., & Sultan, B. (2024). Unraveling Legal Complexities: Muslim and non-Muslim Estate Administration Process in Malaysia and Brunei. *De Jure: Jurnal Hukum Dan Syar'iah*, *16*(2), 531-554. https://doi.org/https://doi.org/10.18860/j-fsh.v16i2.29827

Nawaz, A. (2025). Qandeel was not the Last: Revisiting the Honor Killing in Pakistan. https://doi.org/https://doi.org/10.2139/ssrn.5365115

Neo, J. L. (2020). Regulating pluralism: Laws on religious harmony and possibilities for robust pluralism in Singapore. *The Review of Faith & International Affairs*, *18*(3), 1-15. https://doi.org/https://doi.org/10.1080/15570274.2020.1795414

Pande, D., & Taeihagh, A. (2023). Navigating the governance challenges of disruptive technologies: insights from regulation of autonomous systems in Singapore. *Journal of Economic Policy Reform*, *26*(3), 298-319. https://doi.org/https://doi.org/10.1080/17487870.2023.2197599

Pasuni, A. (2022). Singapore's State Fatwas. In *Routledge Handbook of Islam in Southeast Asia* (pp. 382-402). Routledge. https://doi.org/https://doi.org/10.4324/9780429275449-26

Saleem, Q. U. A., Fatima, S., & Siddiqui, H. (2024). Islamic governance in legal contexts: Navigating challenges and opportunities in contemporary administration. *Journal of Law, Social and Management Sciences*, *3*(2), 8-17.

Shakoor Chandio, A., Tunio, F. H., & Korai, A. G. (2024). Federalism in South Asia: a constitutional analysis of India and Pakistan. *Cogent Arts & Humanities*, *11*(1), 2299536. https://doi.org/https://doi.org/10.1080/23311983.2023.2299536

Shehzad, M., & Afridi, M. "18 th AMENDMENT: BOON AND BANE FOR FEDERALISM IN PAKISTAN" POLITICAL AND ECONOMIC CHALLENGES TO THE FEDERALISM IN PAKISTAN.

Shoukat, D., Ayaz, M., Kanrani, A., Mansha, U., & Shah, U. (2025). Financial Crime Mediation in Pakistan: Legal Ambiguities, Global Trends, and the Restorative Justice Approach. *PAKISTAN JOURNAL OF LAW, ANALYSIS AND WISDOM*, *4*(6), 25-41. https://doi.org/https://doi.org/10.2139/ssrn.5335624

Yilmaz, I., & Sokolova-Shipoli, D. P. (2024). *Muslim Legal Pluralism in the West: Transnationalism, Political Participation, Citizenship and Shari'a*. Springer Nature. https://doi.org/https://doi.org/10.1007/978-981-97-4260-8

Zakaria, U. (2025). *Cosmopolitan Musical Expressions Of Malay Indigeneity In Singapore* Open Access Te Herenga Waka-Victoria University of Wellington].