

A Study on Children's Rights Protection in Family Aspects in Malaysia: Lessons for Zanzibar

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Abstract

Children protection laws on family matters in Zanzibar has been recorded to have a lot of discrepancies. This is due to long-stand existing laws and the existing court hierarchy which exports the conflicts on the application of laws under various courts. However, many efforts have been made by the Zanzibar government to improve the standard on the laws of child protection rights, the existing conflicts between civil laws and shariah law has not comparatively received academic attention over the years in Zanzibar. The existing discrepancies greatly affect the children's rights protection in many areas including family matters. Against this background, a critical exposition is made on the children protection laws on family matters in Malaysia with the purpose to learn and implement Zanzibar laws. The aim is to improve the Zanzibar laws of child protection in family aspects. This paper uses descriptive analysis of legal issues on children's rights protection in family matters under the Malaysian laws and critical existing conflicts under Zanzibar laws.

Important keywords: Child, family matters, Malaysian, protection, Zanzibar.

1. Introduction

The paper discusses the overviews of the legal frameworks of child protection laws of Malaysian under the Malaysian jurisdiction. The reason is to make comparison in order to learn and improve Zanzibar situation in child protection laws in family matters. The study examines the provisions of Malaysia laws on family matters and their application such as maintenance, custody, and legitimacy. The comparative study is adopted to search for best practices when incorporating children related laws as an important component in family law code for Zanzibar. The study introduces the relevant laws on child protection in family matters in Malaysia. It presents a brief account on discrepancies and existing conflicts arise in Zanzibar laws children's rights protection. The study states the reasons for the existence of discrepancies in Zanzibar laws on children's rights protection.

2. Discussion and Materials

The discussion is mainly based on analyses of Malaysia laws as lessons for Zanzibar laws on children's rights protection. The attention will be drawn on discrepancies of the family related laws of Zanzibar on children's rights protection as a causative factor which creates the inadequacy of children's rights protection in family matters and suggestions to reforms the Zanzibar laws. The applicable laws in Malaysia observe some differences in relation to Zanzibar laws on children's rights protection in family matters. The application of the laws on family matters in Malaysia are specified to Muslims and non-Muslims. On other hand, this enhances the better protection of the rights of the children. The discussion shall base under the following headings: -

2.1 Court Structure in Malaysia

The Malaysia court system reflects a plural of *Syariah* Court and Civil Court.¹ The *Syariah* Court is independent of the Civil Court which exists in a dual court structure following Malaysian's independence.² The *Syariah* Court deals with Islamic personal and family law in Malaysia,³ as provided for under Article 74 (2) of the Federal Constitution, 1957 and under List II of Schedule 9.⁴ The court has jurisdiction over personal matters such as betrothal, marriage, divorce, the legitimacy of a child, dowry, maintenance, adoption, succession and religious endowments.⁵ Besides, Malaysian Civil Court is based on common law jurisdictions which consist of Subordinate Courts and Appellate Courts.⁶ The Appellate Court is made up of High Court of Malaya, the High Court of Sabah and Sarawak, the Court of Appeal and the Federal Court. The Federal Court is the highest and final court of appeal⁷ and is the final Court of Appeal.¹ The Federal Court, the Court of Appeal and two High

¹ Sharifah S. Syed Ahmad, *Malaysian Legal System*, 2nd Edition (LexisNexis: Malaysia, 2007), at 173.

² Wan Arfan Hamzi, *Afirst look at the Malaysian Legal System*, Oxford Fajar Sdn Bhd (Negara: Malaysia, 2009), 229.

³ Mwinyi Talib Haji, "Status of *Shari'ia* Court in Zanzibar and Malaysia: A Comparative Exposition", volume 53, (2016), *A Journal of Law Policy and Globalization*, pp. 150-157.

⁴ Mohammed Hafiz Jumaluddin, "Shariah Court in Malaysia and the Development of Islamic Jurisprudence: The Study of Istihsan", (January 2013), *International Journal of Nusantara Islam*, 1-12.

⁵ Najibah Mohd Zin et al., *Islamic Family Law in Malaysia*, Published by Thomson Reuters, Sweet and Maxwell: (Selangor, Malaysia 2016), at 112.

⁶ Valeric Thean, *Law and Practice of Family law in Singapore*, Sweet and Maxwell: Singapore, 2016,12.

⁷ Yvenne Tew, "The Malaysian Legal System: A Tale of Two Courts", Volume 19, (2011), *The Common Wealth Judicial Journal*, pp. 3-7.

Court are Superior Courts established under Article 121 of the Federal Constitution 1957.² The Court of Appeal was established in 1994 to act as an Appellate Court and given the appellate jurisdiction to hear appeals against decisions of the High Court. Both High Courts have unlimited powers over civil³ and criminal jurisdictions and have general supervisory and appellate jurisdiction over Subordinate Courts. The Subordinate Courts consists of the Sessions Court and the Magistrates' Court and the *Penghulu* Court in Peninsular Malaysia.⁴ There are other judicial and quasi-judicial bodies with specific jurisdiction⁵

2.2 Court Structure in Zanzibar

The current Zanzibar court system starts soon after the 1964 independence. The Zanzibar government abolished the former court system, which was a two-tier High Court, known as the His Highness and Her Majesty High Court.⁶ After the 1964 revolution, a single uniform High Court was established for all subjects, which are now called the High Court of Zanzibar. The old Subordinate Court was also replaced by new Subordinate Court which was called the People's Court of Zanzibar.⁷ This People's Court existed until 1985, and later it was again replaced by brother type of the Subordinate Courts was established under the Magistrate Court Act No. 6, 1985. Parallel to the establishment of the High Court of Zanzibar, the Zanzibar Constitution, 1984 also provides for the establishment of Subordinate Courts.⁸ In 1985, the High Court Act No. 2 was passed to set out the existing court system in Zanzibar.⁹ Besides, the powers and establishment of the Zanzibar High Court¹⁰ are provided under Article 93 and 100 of the Zanzibar Constitution of 1984. The High Court is the powerful and Appellate Court in criminals and civil matters in Zanzibar. The other courts which are subordinate to the High Court are such as Chief Kadhis' Court, Kadhis' Court, and the Children's Court.¹¹ The Appellant Court of Tanzania is the final court of Tanzania.¹² Apart from that, the Industrial Court lies parallel with the High Court Division.¹³

2.3 Child Protection Laws in Malaysia

The paper discusses the legal frameworks of Malaysian protection laws in family matters under the Malaysian in order to improve Zanzibar situation in child protection laws in family matters. the paper examines the application of maintenance, custody, and legitimacy. Malaysian realizes the Convention on the Rights which was ratified on 17th February 1995.¹⁴ Besides, the enactment of the Child Act of 2001 indicates the realization of child protection and a success toward Malaysia Government. The other laws of child protection include; Islamic Family Law Federal Territory Act 1984 known as (IFLA), Family Law Reform (Marriage and Divorce) Act of 1978, Adoption Act of 1952, Registration of Adoption Act 1952 (RAA 1952), Legitimacy Act 1961 (revised 1971) (ACT 60). There are two systems for family law¹⁵ in Malaysia one for Muslims and the other for the non-Muslims.¹⁶ Muslims are governed by the Islamic Family Law System,¹ and led by The Islamic Family Law Act,

¹ Wan Arfan Hamzi, *Afirst look at the Malaysian Legal System*, Oxford Fajar Sdn Bhd (Negara: Malaysia, 2009), 203. It Chief Justice, the two Chief Judges of the High Courts in Malaya and Sabah and Sarawak, and at present, four other Federal Court Judges.

² The jurisdiction of the Federal Court and the Court of Appeal is defined by both the Federal Constitution and the Court of Judicature Act 1964 (Act 91) (Revised 1972) (CJA 1964) while that of the High Court is defined only by the CJA 1964.

³ Jane Fortine, *Children's Rights and the Developing Law*, 3rd edition, Edited by Willum Twining, et al., (Cambridge University Press: United Kingdom, 2009), 291.

⁴ Subordinate Courts have limited jurisdiction, they are established by and derived their jurisdiction and powers from the Subordinate Court Act 1948 (Act 92) (Revised 1972) (SCA 1948).

⁵ Example of these court includes the Children Court which was established by the Child Act 2001 (Act 611), which consolidated the Juvenile Courts Act 1947 (Act 90), the Women and Young Girls Protection Act (Act 106) and the Child Protection Act 1991 (Act 469).

⁶ His Highness was for the subject of the sultan, while her Highness deals with British Subjects. See also Rainer Michael Bierwagen and Chris Maina Peter, "Administration of Justice in Tanzania and Zanzibar: A Comparison of Two Judicial Systems in One Country", *The International and Comparative Law Quarterly Volume 38, No. 2* (April 1989), pp. 395-412.

⁷ Ghai, Y, "A Journey Around Constitutions: Reflections on Contemporary Constitutions", *South African Law Journal*, 2005, v. 122 n. 4, p. 804-831.

⁸ Ibid Article 100 of the Zanzibar Constitution establishes other courts, the power is confined under section 5 of the High Court Act No. 2 of 2002

⁹ Othman Masoud Othman, *The Judicial system in Zanzibar*, 2nd edition, edited by Chris Minor Pita and Ammi Sikand, Zanzibar Legal Services Centre (Zanzibar, 2006), at 17.

¹⁰ Was established under the Zanzibar Constitution 1984. The High Court Act No. 2 of 1985 reminds on the continuation and existence of the High Court Under section 3 (1) as explained under section 3 (1) (a) of the High Court Act No. 2 of 1985.

¹¹ Haroub Othman and Chris Minor Peter, *Perspectives on Legal Aid and Access to justice in Zanzibar*, Published by the Zanzibar Legal Services Centre: Zanzibar, Tanzania, 2003), 84.

¹² Hamidu Ismail Majamba, *Perspectives on the Kadhis' Court in Zanzibar*, (Zanzibar Legal Services Centre: Zanzibar Publication Book Series No. 8, 2008), 5.

¹³ section 80 (1) of the Labour Relations Act No. 1 of 2005. See also the Ministry of Justice and Constitutional Affairs in, "Capacity and Needs Assessment of Legal Sector Actors in Zanzibar", *A final Report of the Revolutionary Government of Zanzibar, United Nations Development Program*, (Dar-es Salaam: Tanzania, 2012), at. 37.

¹⁴ Gillian Douglas and Nigel Lowe, *The Continuing Evolution of Family Law*, Family Law Jordan Publishing Limited, (Amman: Jordan, 2009), 217.

¹⁵ Zainah Anuar et al., "Justice and Equality in Muslim Family Law: Challenging, possibilities and reforms", *Washington and Lee Review*, Volume 64, Issue 4, Article 12 (2007): 1529-1549.

¹⁶ Fao Yet Ngo and Kirani Dhaliwal Y N Foo and Partners, "Family Law in Malaysia: An Overview", *Book Review*, Association Corporate

1984.² This law deals with personal matters for all Muslims in Malaysia.³ Besides, the Law Reform (Marriage Divorce) Act, 1976 governs the Chinese, Hindus, as well as other religion on other hand.⁴

The maintenance right in Malaysia is preserved as legal duties of the parents to the children.⁵ For example, the Islamic Family Law (Federal Territories) Act, 1984. For example, section 72 (1) of Act, 1984,⁶ examines a father has an obligation to maintain his children.⁷ The order for maintenance for children is given under section 73 (1 and 2) of the Act, 1984 which provides that, the court may order a man to pay maintenance for the benefit of his children.⁸ The provision placed the responsibility to the father⁹ to provide maintenance to his children. The duty shall not vary whether the child is under the custody of the father or under the custody of another person. The section examines the duty is not ceased even after the dissolution of the Marriage.¹⁰ On other hand section 72 (2) of IFLA, 1984 provides that if the father is unable to maintain, or he is dead or his whereabouts are unknown, the duty shall shift to the male person liable under *Hukum Syarak*¹¹ namely the paternal grandfather and the uncles. The duty to maintain will not be shifted to the mother even though the mother has the means.¹² For example, in the case of *Rohana bt Zakariah v Mokhtar bin Abdul Talib*,¹³ the court discussed the next person liable under *Hukum Syarak* to pay maintenance to a child if the father is incapable shall be transferred to the male persons.¹⁴ The laws put the priority to the father and the father relations in case the real father is incapable of maintaining a child.

The laws in Malaysia, mention also the father is responsible nevertheless the marital relationship with the mother is no longer exists. The laws also provide for the duration of maintenance of children. This is provided in the Islamic Family Law Act, 1984.¹⁵ An age specified for the expiration of the maintenance order, shall be when the child attains the age of eighteen years, however, the court may on application by the child or any other person, extends the order for maintenance to cover such further periods, to enable the child to peruse further or higher education or training.¹⁶

Where the laws applicable to no-Muslims in Malaysia indicates that the parents i.e both the mother and the father are responsible for the maintenance of their children. This was provided under section 93 (1) (a) of the MWCMA 1950 which examines that, parents are responsible for their children's maintenance.¹⁷ It was stated also that, the mother duty to maintain is only secondary to that of the father. Most of the time it may be imposed if the court is really satisfied that the father could not accomplish his duty or he could not provide sufficiently for the child's maintenance the mother is financially capable.

Furthermore, the child protection laws in Malaysia laws acknowledge the principle of best interest of the child in the custody disputes. However, the custody of a child¹⁸ may be held by some other person, the father¹⁹ shall be the first and primary natural guardian²⁰ to care for the child and property of his minor child.¹ In the death

Council, Practical law, (Global Guide, November, 2017), pp. 1-10.

¹ Sebghatullah Qazi et al., "Codified Islamic Law in Muslim World: Trends and Practices", Vol. 6, Issue 12, (November 29, 2016) *Journal of Applied Environmental and Biological Sciences*, pp. 160-171. See Zuleha Kamaruddin, "The Islamic Legal System in Malaysia and the Quest for Transformation in the 21st Century", Volume 6, Issue 11, (2012), *Australia Journal of Basic Applied Sciences*, pp 74-82.

² Raihana Abdullah, "A Study of Islamic Law in Malaysia: A Selected Bibliography", *International Journal of Legal Information*, Vol. 35, Issue. 3, Article 8 (Winter, 2007): 514-534.

³ Nora Abdul Hak, Roslina Che Soh and Noraini Hashim, "Right of a Child to Maintenance: Harmonizing the Law of Malaysia", *IJUM Law Journal*, (2009), pp. 1-8.

⁴ Raihana Abdullah, "A study of Islamic Law in Malaysia: A Selected Bibliography", *International Journal of Legal Information*, Vol. 35, Issue. 3, Article 8 (Winter, 2007): 514-534.

⁵ Najibah Mohd Zin et al., *Islamic Family Law in Malaysia*, Published by Thomson Reuters, Sweet and Maxwell: (Selangor, Malaysia 2016), at 5.1984.

⁶ Islamic Family Law (Federal Territories Act 1984).

⁷ Section 72 (1) of the Islamic Family Law (Federal Territories Act 1984).

⁸ Ibid section 73 (1 and 2) of the Islamic Family Law (Federal Territories Act 1984).

⁹ Magaji Chiroma, Mohamad bin Arifin, Hunud Abia Kadouf, "The Application of Islamic Law in Modern Muslims States: A Comparative Analysis of the Nigerian and Malaysian Systems", Volume 9, *Journal of Islamic States Practices in International Law*, pp.61-91.

¹⁰ In Sabah, adoption is governed by the Adoption Ordinance 1960 and in Sarawak, Adoption Ordinance Cap 91 is applied. The status of children adopted under the Adoption Act 1952, the Sabah Adoption Ordinance 1960 and the Sarawak Adoption Ordinance Cap. 91 are essentially similar.

¹¹ Provided under proviso of section 72 (1).

¹² Ibid. see also Brenda Hale et al, *The Family, Law & Society Cases & Materials*, 6th edition, oxford University Press London: UK, (2009).

¹³ (2009) 27 JH (11) 279.

¹⁴ The Holly Quran (Al-Baqara: 233), imposes the duty on the legal heirs.

¹⁵ Under section 79 (a, b, c) (i, ii).

¹⁶ As prpvided under proviso of Section 79

¹⁷ Badruddin Haj Ibrahim, "The Child Rights to Maintenance: The Extent of the Family Responsibilities in Islamic Law and According to the Family Law Provisions of Muslim Countries", Volume 25, (2011), *Arab Law Quarterly*, pp. 401-422.

¹⁸ Roslina Che Soh, Nora Abdul Hak, (2011), Application of *Maslahah* (interest), in Deciding the Rights of the *Hadanah* (custody) of the Child "The Practice in the Shariah Court of Malaysia", 7 (13), *Journal of Applied Sciences Research*. pp 2018-2188.

¹⁹ Steven Pinker (2018). *Enlighten Now Humanism and Progress*. Published by Penguri Random House: New York: USA pp. 8.

²⁰ Roslina Che Soh @Yusoff, Noraini Moh'd Hashim, "Children's Right in Custodial Disputes: The Extent of the Application of Best Interest of the Child Principle under the Malaysian Laws" *the International 7th Conference on Humanities and Social Sciences*, 2015: Challenges and Opportunities", Faculty of Liberal Arts, Prince of Songkla University, June 5-6, 2015 pp. 555-570.

of a father, the legal guardian of a child delegates upon either the fathers' father, or the executor appointed by the father's will, or the father executor's provided that he is a Muslim.² Furthermore, section 81 (2) considers the order of priority provided under custody to such other person does not affect the welfare of the child.³ Besides the Act, 1984 provides that, the right to custody of the child terminates upon the child attaining the age of 9 years in the case of a male child. Where the child is a girl, the age shall be eleven years for a period of maintenance.⁴ Similarly, the court has the authority to make an order for custody of the child.⁵ Though, section 86 (2) examines that, however, the custody is the right of the child of either parent, the welfare of the children is the paramount consideration⁶ before any decision is made by the court in determining the custodial disputes.⁷ Thus, it is a significant improvement in the effort to maintain the children's rights protection.⁸

In relation to section 88 (1) of the Law Reform Marriage and Divorce Act 1976 (LRA) applies to non-Muslims, unlike Act, 1984 confers the power to the court to make the order of custody of a child to either mother or father.⁹ therefore, the court usually gives the custody of the child to the mother when he is under infant age. This is because at the infant age of the child mother is capable of caring for a child. Though, there is be a rebuttable presumption that, whether the child welfare under the early age is better to be with the mother or father.¹⁰ Furthermore, section 95 of the LRA provides that the duration order for the custody right which shall perish upon achieving the age of majority. Also, section 3 of the Guardianship Infants Act 1961, perceives that it is the duty of the guardian to cares for the infant person. It was related that, the guardian shall be responsible for the custody of the child and respond to support his health and education and the welfare of the child. In relation to the custody of the child, the mother shall have same rights and authority as the law allows to father.¹¹

3. Discrepancies of the Child Protection Laws in Family Matters in Zanzibar

The constitution of Zanzibar of 1984 and the constitution of the United Republic of Tanzania of 1977 have the connection on the judicial system. The two constitutions are linking in the court hierarchy on account of Appeal.¹² The structure of the courts of Zanzibar realizes that the court has some contradictions due to the existing dual system, which arises many conflicts of laws.¹³ The conflict of laws mainly arises in adjudicating Islamic laws and civil laws

The laws on child protection in Zanzibar examines the conflicts arising between the existing laws.¹⁴ Some laws are long time existed in Zanzibar and need reforms for more effective protection. The practices and applications of Islamic laws in Zanzibar appear to be poorly enforced in different Islamic institutions, especially in the Kadhis' Court as it has no exclusive jurisdiction to deal with Muslims personals laws.¹⁵ The power of the court is very crucial in adjudicating the children's rights protection.

Many countries including Malaysia have specific family laws, as comparison, in Zanzibar, there are no specific laws which deals with family matters. This leads to the inadequacy of the application of the law on children's rights protection.¹⁶ The specific law in family law needs to be legislated in reducing the conflicts laws. Example the application of the law between Kadhis' Court and the Children's Court, examines a similar jurisdiction on maintenance, custody of children in which the Kadhis Court already provides.

The legitimacy of the child is guaranteed in the Children's Act No. 6, 2011, but it seems that the Act is contrary to Kadhis Court. The provisions on the legitimacy of the children require the new enactment as they are

¹ Kamala M.G Pillai, *Family Law in Malaysia*, Lexis Nexis Malaysian Law Journal, SDN BHP: (Kuala Lumpur: Malaysia, 2009), at 69.

² Section 88 (1) of the Islamic Federal Law Enactment Act 1984.

³ As was provided under section 81 (2) of the Islamic Family Law Enactment Act 1984.

⁴ Section 84 (1) of the IFLA, 1984.

⁵ Ibid section 86 (1).

⁶ Section 88 of IFLA, 1984. See also Nora Abdul Hak, et al., "Right of A Child to Maintenance: Harmonizing the Laws in Malaysia", *Law Journal of International Islamic University of Malaysia*, (2016), pp. 1-8.

⁷ Section 86 (2) of the IFLA, 1984.

⁸ Aaysha Rafiq et al., "Child Custody in Classical Islamic Law and Laws of Contemporary Muslim World (An Analysis)", Vol. 4 (March 2014), *International Journal of Humanities and Social Science*, pp. 267-277.

⁹ This right is given to a child unless there are exceptional circumstances making it undesirable that the child be entrusted to either parent may choose either of the relative.

¹⁰ Section 88 (3) of the Law Reform (Marriage and Divorce) Act 1976.

¹¹ It was provided under section 5 (1) of the Guardian ship of the Infants Act 1961.

¹² Hamidu Ismail Majamba, *Perspectives on the Kadhis' Court in Zanzibar*, (Zanzibar Legal Services Centre: Zanzibar, Publication Book Series No. 8, 2008), 5.

¹³ Makame, *The Child and the Law Some Basic issues*, 1st edition, (Zanzibar Legal Services Centre: Zanzibar, 2016), at. 21.

¹⁴ Ministry of Justice and Constitutional Affairs in, "Capacity and Needs Assessment of Legal Sector Actors in Zanzibar", *A final Report of the Revolutionary Government of Zanzibar, United Nations Development Program*, (Dar-es Salaam: Tanzania, 2012), at. 37 and The Ministry of Constitutional and Legal Affairs, *United Republic of Tanzania: A National Human Rights Action Plan 2013-2017*, (Dar-es-Salaam: Tanzania, 2013), at 1-2.

¹⁵ Evelien Van Der Zweek, "The Application of Islamic Family Law and Human Rights: A Case Study of Tanzania Mainland", (*Mater Theses: University Utrecht*, July 2015), at 65.

¹⁶ Sloth Nielsen, J., "Ratification of the United Nations Conventions Convention on the Rights of Child: Some Implications for South Africa Law", Volume 11, issue 3, (2nd February, 2016), *South African Journal of Human Rights*, pp. 401-420.

not well examined. Moreover, the custody of children is addressed under section 58 (1) of the Children's Act No. 6, 2011 and section 5 of the Kadhis' Court No 9, 2017. The Children's Act requires the age to be 18 while the Kadhis' Court Act mentions the age 7 for a male child, and if the child is female then the custody will end when she gets married. The Children's Act No. 6, 2011 seems to follow international requirements while the Kadhis' Court follows Islamic principles.

4. Suggestions.

There is a need for codification of Family Law in Zanzibar. The absence of the specific law which discourses the family matters contributes to the lack of children's rights, especially in family matters. This modification aims to upgrade the status of both courts including the Kadhis' Court. The Kadhis' Court should be given the exclusive jurisdiction so as to retain the confidence to the Kadhis in deciding the Muslim cases and the society at large.

The Kadhis' Court should be upgraded into the three-tier court system as in Malaysia. The Kadhis' Court should be imposed with the full jurisdiction to entertain the whole matters emanating from the shariah. The structure needs to be separated and independent of each other, and the powers should be properly examined and independently in each court.

Enforcement of the law in Zanzibar in family matters need to be regulated, for example, the enforcement of the maintenance provisions provided by Children's Act No. 6 of 2011 does not regard Muslims or non-Muslims, however, the Kadhis' Court provides the enforcement for Muslims only to avoid such contradiction the provisions need to be clearly stated in its application

The legitimacy of the child is determined by lawful wedlock while in Children's Court is determined by inside wedlock and outside of wedlock by using DNA test. Hence the enforcement of the legitimacy status of the child should be enforced in separate courts, this will allow Muslims to be determined by Kadhis' Court only and by using Islamic law to avoid the contradictions. The specification of the application of laws as Malaysian need to be learned.

The law regulating family matters in Zanzibar need to be observed. The maintenance laws on child rights protection are under both Malaysia and Zanzibar give the responsibility to father to maintain his child. More emphases are needed for more details provisions on the Zanzibar laws on shifting the responsibly of the father upon death or disabilities.

5. Conclusion

The Zanzibar laws by following Malaysia will improve the child protection laws. The system of Zanzibar by adopting Malaysia will enhance the children's rights protection in family matters in Zanzibar, however, the reforms need time and budgeting. The applications of the laws need to be observed for the Muslims and non-Muslims. The laws need to be updated in all aspects including the child protection laws for the protection of the children's rights.

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