

## THE ROLE OF FORENSIC SCIENCE IN DETERMINING THE AUTHENTICITY OF DOCUMENTARY EVIDENCE TOWARDS STRENGTHENING ITS ACCEPTANCE UNDER THE MALAYSIAN SYARIAH COURTS

<sup>i,ii,\*</sup>Mohamad Aniq Aiman Alias, <sup>i,ii</sup>Wan Abdul Fattah Wan Ismail, <sup>i,ii,iii,iv</sup>Ahmad Syukran Baharuddin, <sup>i,ii</sup>Hasnizam Hashim & <sup>v</sup>Tuan Muhammad Faris Hamzi Tuan Ibrahim

<sup>i</sup> Faculty of Syariah and Law, Universiti Sains Islam Malaysia (USIM), 71800, Nilai, Negeri Sembilan, Malaysia

<sup>ii</sup> Centre of Research for Fiqh Forensics and Judiciary (CFORSJ), Faculty of Syariah and Law, Universiti Sains Islam Malaysia (USIM), 71800, Nilai, Negeri Sembilan, Malaysia

<sup>iii</sup> International Advisory Board Member, Mejellat Al-Afaq wa Al-Maarif (JSKP), Faculty of Humanities, Islamic Sciences and Civilization, University Amar Telidji of Laghouat, BP 37G, Road of Ghardaia, 03000 Laghouat, Algeria

<sup>iv</sup> Associate Editor, Journal of Contemporary Maqasid Studies, Maqasid Institute, United States of America (USA)

<sup>v</sup> Faculty of Social Sciences and Humanities, Universiti Teknologi Malaysia (UTM), 81310, Skudai, Johor, Malaysia

\*(Corresponding author) e-mail: [aniqalias@usim.edu.my](mailto:aniqalias@usim.edu.my)

### ABSTRACT

In the contemporary digital era, Islamic legal institutions in Malaysia face significant challenges related to the authenticity and verification of documentary evidence, particularly with the increasing reliance on electronic documents. Conventional Islamic methods for determining document authenticities—such as *al-iqrar* (confession), *al-syahadah* (testimony), *al-yamin* (oath), and *al-qarinah* (circumstantial evidence)—are becoming less effective in addressing issues like document falsification and the submission of illegitimate evidence. This article examines forensic science's pivotal role in enhancing documentary evidence's reliability and legitimacy within the Malaysian Syariah Courts. It highlights Syariah law practitioners' limitations due to the absence of specific procedures for accepting scientific evidence and gaps in understanding forensic methodologies. The study underscores the necessity of establishing comprehensive guidelines and standard operating procedures by analyzing the impact of documentary doubts and advocating for the integration of forensic experts, cybersecurity authentication, and laboratory verification. Additionally, it recommends enhancing practitioner education and fostering collaboration with forensic institutions. These advancements aim to facilitate the effective incorporation of forensic science into Islamic legal practices, strengthening the acceptance and validity of electronic and modern forms of documentary evidence in Syariah judicial processes. Ultimately, this article demonstrates how embracing forensic science is essential for fortifying a robust and credible legal system within the framework of Malaysian Syariah law.

**Keywords:** *Forensic science, documentary evidence, Syariah Courts, document authenticity, legal verification*

## Introduction

In today's sophisticated digital age, Islamic legal institutions in Malaysia frequently confront challenges related to the court's jurisdiction and the acceptance of new forms of documentary evidence. According to Ismail (2006), the emergence of various new document formats indirectly opens avenues for issues such as document falsification, questions regarding the legitimacy of submitted documents, and uncertainties about the court's jurisdiction to accept or reject new types of evidence, including electronic documents.

Islam provides several methods for determining the authenticity of documents. Al-Zuhaily (1994) identifies methods such as *al-iqrar* (confession), *al-syahadah* (testimony), *al-yamin* (oath), and *al-qarinah* (circumstantial evidence). However, conventional verification methods like direct testimony and confession are increasingly challenging to implement in modern times (Wan Ismail, 2020). Moreover, individuals today are less deterred from providing false testimonies and confessions for personal gain (Alias et al., 2021a). Consequently, forensic science becomes crucial for evaluating documentary evidence, employing forensic experts, cybersecurity authentication, and laboratory verification to assist the court in addressing document validity and forgery issues.

Despite the importance of these methods, awareness and understanding of the verification processes remain limited among Syariah law practitioners. This gap exists because there are no specific procedures or guidelines for accepting scientific evidence within the Syariah court system. As a result, legal practitioners in this field are often underexposed to cases involving forensic science (Ahmad et al., 2019; Yahya et al., 2017). A failure to adequately comprehend and interpret forensic evidence can lead to an imperfect *ijtihad* process (Baharuddin, 2017a).

This article, therefore, aims to discuss forensic science's role in determining the authenticity of electronic documents as evidence, aiming to strengthen their acceptance in Malaysian Syariah Courts. The discussion begins with exploring the impact of documentary doubts as evidence, followed by an introduction to forensic science and its role in the administration of justice. It then examines the current admissibility of forensic science in documentary evidence within the Malaysian Syariah Courts, highlighting the need for enhanced guidelines and procedures to effectively integrate forensic methods into Islamic legal practices. By addressing these topics, this article aims to contribute to a deeper understanding of how forensic science can bolster the reliability and legitimacy of documentary evidence in Syariah law.

### The Impact of Documentary Doubt as Evidence

Documents serve as crucial proof in legal matters, especially in cases involving marriage, *muamalat* (transactions), and criminal offenses (Wan Ismail, 2020). Their significance extends beyond legal frameworks, as they are integral to everyday transactions among governments, judges, and ordinary citizens (Othman, 1990). In court, documents are presented to substantiate claims, necessitating a rigorous examination of their authenticity (Omar et al., 2020). The importance of documentation is further emphasized in religious texts, particularly in the Holy Quran, where Allah S.W.T states:

Translation: "Believers! Whenever you contract a debt from one another for a known term, commit it to writing."

(Al-Qur'an. Surah Al-Baqarah, 2:282)

Ibn al-'Arabi (1967) notes that this directive underscores the necessity of keeping accurate records of business transactions and debts, thus safeguarding against forgetfulness over time. Ibn Kathir (2003) reinforces this notion by highlighting that written records serve as crucial evidence of the transaction details, bolstering the credibility of witness accounts. The Prophet Muhammad (PBUH) also emphasized the importance of documentation:

Translation: “It is the duty of a Muslim who has something to be left as a bequest not to have it for two nights without having his will written down about it.”

(Narrated by Musnad Imam Ahmad ibn Hanbal, Hadith 5197)

This hadith illustrates the necessity of having a written will. Ibn al-Qayyim (2007) argues that the Prophet (PBUH) would not have encouraged recording wills if documentation were not essential as proof. Additionally, Ibn Hajar (1996) concurs, asserting that important information should always be documented to preserve its integrity.

However, a re-examination is warranted when doubts arise regarding the authenticity of a document presented as evidence. A document is only admissible if its validity is first established (Othman, 1990). Failure to authenticate documents can lead to potential falsification (Arbouna, 1999). This was evident in the case of *Ajmawati Atan v. Moriazi Mohamad* [2005] 1 CLJ (SYA) 54, where the unclear admissibility of digital documents necessitated a retrial, along with supporting witnesses. Such cases underscore the necessity of ensuring that documents are genuine to be accepted as valid evidence in court.

The falsification of documents presents a significant challenge in legal proceedings (Yahya et al., 2017). This issue is not a modern phenomenon; it dates back to the reign of Caliph Uthman ibn Affan (RA), which had significant political consequences (Wan Ismail et al., 2015). Falsification occurs when the presented evidence diverges from the original truth, leading observers to erroneously accept it as valid (At-Tabari, 2008). In court, if a document is alleged to be counterfeit or its validity is challenged, it possesses the authority to reject it. It is incumbent upon the presenting party to establish the document's authenticity (Anwarullah, 2010; Arbouna, 1999).

Given these complexities, ensuring the authenticity of submitted documents is paramount. Therefore, applying forensic science principles to assess the validity of documents in the Syariah Court is crucial. Forensic science plays a critical role in resolving court cases, as it helps determine the authenticity of documents. This application not only enhances the credibility of the evidence but also minimizes the chances of rejection and facilitates the early detection of document forgery.

### **An Introduction to Forensic Science and Its Role in the Court of Justice**

Forensic science is the application of scientific knowledge and methodologies to legal problems and proceedings (Prahlow, 2010). The term “forensic” derives from the Latin *forensis*, meaning forum or public debate, highlighting its historical association with legal argumentation (TG Team, 2015). Baharuddin (2017b) explains that forensic science employs modern scientific methods to solve various issues, particularly court cases, investigations, and crimes. It encompasses the scientific procedures used to obtain criminal evidence and insights from multiple fields of knowledge (Md Yusuff, 2020). Metwally (2009) further defines forensic science as applying scientific or technical practices to identify, collect, evaluate, and interpret evidence for civil and criminal law or administrative matters.

Saferstein (2015) describes forensic science as applying science to the criminal and civil laws enforced by police agencies within a criminal justice system. It involves using scientific principles to address legal issues and solve related problems (Ahmad et al., 2019). Thus, forensic science is a crucial discipline for resolving cases or investigations by applying scientific methods in court settings.

Forensic science encompasses various sub-disciplines, each requiring specific expertise, such as forensic pathology, forensic odontology, forensic accounting, forensic entomology, forensic serology, forensic anthropology, forensic criminology, computer and digital forensics, forensic toxicology, deoxyribonucleic acid (DNA) analysis, physical analysis, chemical analysis, and biological analysis (Mahussin et al., 2021; Alias, 2023; Ahmad et al., 2019). This diversity demonstrates that forensic science plays a vital role in the justice system, whether through oral testimony or documentary evidence (Rajamanickam et al., 2012). It employs scientific techniques to collect, analyze, and present evidence in court, applying scientific methodologies to detect and investigate crimes (Md Yusuff, 2020).

Islamic history illustrates that forensic science has been utilized as proof. Baharuddin (2017a), in his study titled “The Integration of Forensic Science Fundamentals and Al-Qarinah Toward Achieving Maqasid Al-Shari'ah”, highlights the story of Prophet Ya'qub (Jacob) and his sons in Surah Yusuf, verses 16-18. In this narrative, Prophet Ya'qub's sons deceived him by bringing back Prophet Yusuf's (Joseph) shirt, stained with false blood, while neglecting to tear it, a typical sign of predatory animal attacks. Prophet Ya'qub's refusal to accept this fabricated story illustrates his keen observational skills, as he noted inconsistencies such as the shirt's intact condition and the nature of the blood. His experience enabled him to discern between human and animal blood, illustrating the importance of analytical thinking in evaluating evidence (Ibn Kathir, 2003).

These discussions indicate that forensic science is critical in resolving court cases. Therefore, it is evident that forensic science is essential for determining the authenticity and validity of documentary evidence presented in the Syariah Court. By employing scientific methods to scrutinize documents, forensic science enhances the integrity of the evidence and contributes to the fair administration of justice. As the legal landscape evolves, integrating forensic science into court proceedings is vital for upholding legal standards and ensuring accurate verdicts.

### **The Current Admissibility of Forensic Science in Documentary Evidence in the Syariah Court of Malaysia**

Baharuddin (2017a) emphasizes that forensic science plays an extensive role, including its application in document verification. He asserts that forensic science is essential for determining the authenticity of documents, particularly electronic ones submitted as evidence, and verifying whether a document is genuine. This underscores the importance of applying forensic science to address issues when presenting documentary evidence.

Furthermore, forensic analysis, accompanied by thorough explanations, can serve as supporting evidence in legal cases. For instance, submitting documents that have undergone forensic analysis can help maintain the authenticity of the evidence presented in court and prevent forgery (Wan Ismail et al., 2021; Alias et al., 2021b). If the analysis reveals any doubt, the document must be rejected before being presented in court as evidence. Expert opinions, such as those from forensic specialists, strengthen the evidence submitted (Mohd Yusof et al., 2021). Courts typically require both the prosecution and the defense to present expert testimony to support their cases, or the court may summon witnesses from among experts on its initiative (Nasri et al., 2017).

The admissibility of forensic science in documentary evidence in the Syariah Court of Malaysia is exemplified in the case of *Pendakwa Syarie Negeri Sabah v. Rosli Bin Abdul Japar* ([1428H] JH XXIII/II). Scientific evidence from DNA test reports and expert forensic testimony were utilized in this case. The defendant was found guilty of unlawful sexual intercourse, resulting in the birth of an illegitimate child. Expert testimony and scientific evidence from DNA testing involving three blood specimen contributors were critical in the court's decision. A DNA expert from the Malaysian Chemistry Department conducted the DNA tests. The Syariah Court accepted the prosecution's argument that the defendant's crime was substantiated by strong circumstantial evidence, successfully proven through scientific methods, namely the DNA test report and forensic expert testimony. This demonstrates that forensic analysis plays a significant role in evidence verification.

Moreover, the Syariah Court has generally adopted scientific evidence based on Practice Direction No. 4 of 2020, titled “Submission of Forensic Evidence in Syariah Court Proceedings” (see Figure 1).



**جابتن كحاکيمن شرعية مليسيا**  
**KETUA PENGARAH/KETUA HAKIM SYARIE**  
Jabatan Kehakiman Syariah Malaysia  
*Department Of Syariah Judiciary Malaysia*  
Aras 7, Blok C, Kompleks Islam Putrajaya  
No. 20, Jalan Tunku Abdul Rahman, Presint 3  
62100 PUTRAJAYA  
MALAYSIA

PERBICARAAN

Tel : 603-8870 9300  
Faks : 603-8870 9316  
Portal Rasmi : [www.jksm.gov.my](http://www.jksm.gov.my)  
E-mel : [naim1@esyariah.gov.my](mailto:naim1@esyariah.gov.my)

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YAA Ketua-Ketua Hakim Syarie,  
Mahkamah-Mahkamah Syariah Negeri-Negeri

**ARAHAN AMALAN NO. 4 TAHUN 2020**  
**PENGEMUKAAN BUKTI FORENSIK DALAM PROSIDING DI MAHKAMAH SYARIAH**

Saya ingin menarik perhatian YAA kepada keputusan Persidangan Ketua-Ketua Hakim Syarie Seluruh Malaysia Kali Ke-75 Bil. 3 dan Mesyuarat Jawatankuasa Induk Arahan Amalan Mahkamah Syariah Seluruh Malaysia Tahun 2020 pada 14 hingga 15 Safar 1442H bersamaan 3 hingga 4 Oktober 2020 di Johor Bahru, Johor Darul Takzim yang telah bersetuju dan mengesahkan untuk menerima pakai Arahan Amalan berhubung dengan bukti forensik dalam prosiding di Mahkamah Syariah bagi kes mal dan jenayah syariah sebagai salah satu pembuktian yang boleh didengar, dipertimbangkan, dinilai dan boleh diterima di Mahkamah Syariah.

Arahan Amalan ini berkuat kuasa dengan serta-merta.



**DATO' SETIA DR. HAJI MOHD. NA'IM BIN HAJI MOKHTAR**  
Ketua Pengarah/ Ketua Hakim Syarie,  
Jabatan Kehakiman Syariah Malaysia.  
PUTRAJAYA

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SYARIAH ASAS KEADILAN

Source: Official Website Department of Syariah Judiciary Malaysia

**Figure 1:** Practice Direction No. 4 of 2020, namely Submission of Forensic Evidence in Proceedings in Syariah Courts

This directive outlines the procedures and acceptance criteria for forensic evidence, indicating a progressive approach towards integrating scientific methods within the Islamic legal framework. However, gaps remain in the implementation guidelines within the Syariah Court of Malaysia, and a lack of specific provisions concerning the acceptance of forensic science can slow down the judicial process. Therefore, it is suggested that further studies be conducted to establish Standard Operating Procedures (SOPs) and their implementation in the Syariah Court. This would provide a valuable

reference and guide for legal practitioners when handling similar cases in the future, ensuring a more efficient legal process.

Integrating forensic science into the Syariah Court system presents an opportunity to enhance evidence's overall credibility and reliability. Adopting advanced forensic methodologies as the legal landscape evolves can help bridge the gap between traditional practices and contemporary scientific standards. The Syariah Court must keep pace with advancements in forensic science, as this will improve the accuracy of evidence assessment and reinforce public confidence in the judicial process. Developing a cohesive framework that addresses forensic evidence's procedural and scientific aspects will be essential for fostering a more effective and equitable legal system in Malaysia.

### **Suggestions for Enhancing the Role of Forensic Science in Syariah Courts**

Integrating forensic science into Syariah's judicial practices necessitates the development of comprehensive guidelines to address the admissibility and use of scientific evidence. Establishing a standardized framework, such as a dedicated Standard Operating Procedure (SOP) for forensic evidence, is crucial for ensuring uniformity and consistency in judicial decision-making. This SOP should outline clear protocols for submitting, analyzing, and presenting forensic evidence, considering the unique requirements of Islamic jurisprudence. Implementing such procedures enhances accuracy by ensuring consistent methodologies, maintaining the chain of custody, and adhering to quality assurance measures. This approach ultimately bolsters the reliability of forensic analysis and supports informed judicial decisions.

Additionally, there is a pressing need to enhance awareness and understanding of forensic science among Syariah legal practitioners. This can be achieved through targeted training programs, workshops, and continuous professional development initiatives. Equipping judges, lawyers, and court officers with the necessary knowledge and skills will prepare them to handle complex forensic evidence and make informed decisions (Muhammad, 2016). Collaboration between Syariah courts and forensic institutions is another area that warrants attention. Strengthening partnerships with forensic laboratories, cybersecurity experts, and academic institutions will facilitate access to cutting-edge technology and expert testimony. This collaboration improves the credibility and reliability of evidence and ensures that the Syariah court system remains relevant and adaptive to technological advancements.

Furthermore, incorporating forensic science education into the curriculum of Islamic legal studies can prepare future legal practitioners for the evolving demands of the justice system. Encouraging interdisciplinary studies that blend Islamic law with forensic science will foster a new generation of legal professionals proficient in both domains. Baharuddin (2017a) emphasizes the importance of integrating forensic science principles with Islamic jurisprudence to achieve the objectives of Shariah (*maqasid al-shariah*).

Finally, adopting a forward-looking strategy is essential for bridging the gap between traditional Syariah practices and contemporary legal standards. By embracing forensic methodologies and fostering an innovative judicial environment, the Syariah courts in Malaysia can set a benchmark for integrating science and Islamic law. This integration will ensure justice is administered effectively in an increasingly digital era, enhancing public confidence in the legal system and promoting the equitable application of Islamic law.

### **Conclusion**

Forensic science plays a crucial role in determining the authenticity of electronic documentary evidence, thereby assisting the Syariah Courts in overcoming issues of document forgery and the limitations of conventional verification methods such as direct testimony and confession. To ensure effective integration between forensic science and Islamic legal practices, there is a pressing need to develop specific guidelines and procedures for accepting scientific evidence within the Syariah legal system. This will enhance consistency in the judicial process and ensure that the courts are equipped to handle the complexities of modern evidence.

Increasing awareness and understanding of forensic verification processes among Syariah legal practitioners is essential. Through ongoing training and education, these practitioners can more effectively handle forensic evidence in court proceedings, thereby improving the quality of legal judgments. The application of forensic science in proving electronic documents strengthens the processes of *ijtihad* and justice, enhancing the administration of justice in the Malaysian Syariah Courts and leading to fairer and more accurate decisions.

By embracing forensic science, the Syariah legal system can modernize its evidentiary procedures while remaining faithful to Islamic legal principles. This integration will not only address current challenges related to electronic evidence but also prepare the courts to adapt to future technological advancements, ensuring that justice is served in an increasingly digital world.

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