

**DOES THE NALT REFERENCING STYLE GUIDE CATER FOR *SHARĪ'AH*
SOURCES? AN APPRAISAL AND PROPOSALS FOR REFORM**

BY

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ABSTRACT

Legal scholarship thrives on accuracy, clarity, and verifiability. In Nigeria, where the legal system is pluralistic, that is, embracing common law, customary law, and Islamic law, the need for a referencing style that reflects this plurality becomes necessary. The Nigeria Association of Law Teachers (NALT) Uniform Citation Guide was developed to provide uniformity and clarity for law teachers, researchers, and students across the country. However, it is pertinent to ask whether the NALT referencing style adequately caters for *Sharī'ah* sources, which occupy a significant place in Nigeria's legal and social fabric. This article undertakes a critical appraisal of the NALT Guide, focusing on its treatment, albeit, or lack thereof, of Islamic legal sources such as the *Qur'ān*, *ḥadīth*, classical Arabic texts, contemporary Arabic literature, and online *fatwā* repositories. Through doctrinal approach of research methodology, it identifies the inadequacies of the current guide, compares NALT with other referencing traditions such as OSCOLA, the Chicago Manual of Style, and Islamic-law specialist referencing guides, and considers the practical implications of this omission for Nigerian legal academia. The article concludes with recommendations for the incorporation of *Sharī'ah*-specific referencing rules into NALT, demonstrating that such an addendum would not only enrich the Guide but also ensure that it reflects the plural legal reality of Nigeria.

Keywords: NALT, Reference Guide, *Sharī'ah* sources, Literature.

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1. Introduction

In every academic community, the importance of a uniform referencing system cannot be overstated. Citation rules serve as the backbone of scholarly writing: they assure the reader of the reliability of claims made, allow sources to be verified, and prevent plagiarism.² Within the Nigerian legal academic community, the Nigeria Association of Law Teachers (NALT) has responded to this necessity by producing a uniform referencing style, commonly known as the NALT Uniform Citation Guide.³ Faculties of law and journals are increasingly adopting the Guide across the country, thereby providing a shared standard that mirrors similar efforts elsewhere, such as the Oxford University Standard for the Citation of Legal Authorities (OSCOLA) in the United Kingdom and the Bluebook in the United States.⁴

Yet, Nigeria's legal system is not monolithic. Alongside the statutory and case law of the common law tradition inherited from colonialism, and the customary laws of various ethnic communities, lies *Sharī'ah* law,⁵ which is constitutionally recognised and judicially enforced, especially in several northern states.⁶ The pluralistic nature of Nigerian law means that legal scholarship in the country must grapple with materials from its diverse legal traditions.⁷ A referencing style that is silent on one aspect of legal scholarship risks marginalising an entire tradition of scholarship. This is particularly true of Islamic law, where sources include not only contemporary legal texts but

² Aliyu Aliyu Imam, 'Referencing Style in The Nigeria Academia: The Challenges of Islamic Law Researchers', *Fountain University Law Journal* (2025) (4)(2) 309-310.

³ See Nigerian Association of Law Teachers Manual on Legal Research Basic Guide for Law Faculties and Legal Research Institutions in Nigeria: A Manual on Legal Research Format and Citation Guide for Legal Research Writing (NALTs' Bluebook Basic Guide) Series No. 2, 2021 <<https://sabilaw.org/wp-content/uploads/2022/06/NALT-Guidebook-as-printed-in-2022-1.pdf>> 5 September 2025; Nigerian Association of Law Teachers', 'Some Tips on General Uses of the NALT Uniform Citation Guides' <<https://www.naulawreview.org/wp-content/uploads/2020/07/Part-II-NALT-STYLE-GUIDE-2.pdf>> 5 September 2025.

⁴ See <https://www.law.ox.ac.uk/sites/default/files/migrated/oscola_4th_edn_hart_2012.pdf>; <<https://www.legalbluebook.com/>> 5 September 2025.

⁵ Mamman Lawan, 'Islamic Law and Legal Hybridity in Nigeria' *Journal of African Law* (2014) (58)(2) 304; A A Oba, 'Islamic Law as Customary Law: The Changing Perspective in Nigeria', *The International and Comparative Law Quarterly* (2002) (51)(4) 821.

⁶ Constitution of the Federal Republic of Nigeria 1999 (as amended), Section 6, 275–279; *Usman v. Umaru* (1992) 7 SCNJ (Pt. 2) 388 at 404; *Alkamawa v Bello* (1998) 6 SCNJ 127 at 139;

⁷ Abdulmimini A Oba, 'Towards Rethinking Legal Education in Nigeria' *Journal of Commonwealth Law and Legal Education* (2008) (6) (1) 99.

also sacred texts such as the *Qur'ān* and *ḥadīth*, classical Arabic compendia, and *fatwā* collections.⁸

The absence of explicit guidelines in the NALT referencing system for citing *Sharī'ah* sources raises serious concerns. How should a researcher cite *Qur'ānic* verses? Should the reference point be the page number of an English translation or the canonical division of *sūrah*⁹ and *āyah*¹⁰? When citing *Ḥadīth*, should one adopt the numbering of a particular edition or rely on the universally accepted *kitāb*¹¹ and *bāb*¹² classifications? How should Arabic names be transliterated, and what is the rule for bilingual Arabic–English editions?

This article aims to suggest a synoptic answer to these questions. It briefly evaluates the current NALT Guide, identifies the lacunae with respect to *Sharī'ah* materials, compares the Guide with other referencing styles that have attempted to resolve these issues, and proposes a systematic addendum that can be incorporated into NALT.¹³ In doing so, the article makes a modest but important contribution to Nigerian legal scholarship by ensuring that the referencing style reflects the pluralism of Nigerian law and enhances the visibility and credibility of *Sharī'ah* scholarship in the academy.

2. An Overview of the NALT Referencing Style

The NALT Uniform Citation Guide was developed with the primary objective of harmonising the diverse referencing practices found across Nigerian law faculties and journals.¹⁴ Prior to its adoption in 2023,¹⁵ Nigerian law teachers relied on a patchwork of styles, including OSCOLA, the Bluebook, and locally improvised systems. The lack of uniformity led to confusion, inconsistency,

⁸*n. 1*, 309-311

⁹ Qal'aji Ruwās Muhammad, *Mu'jam Lugah al-Fuqahāa* (Dār al-Nafāis Lenanon 1996)

¹⁰ *ibid.*

¹¹ *ibid.*

¹² *ibid.*

¹³ Recent study had proposed a unique Sharī'ah referencing style upon the review of a particular faculty referencing style. See *n. 1*, 316-318.

¹⁴ See forward to the *NALT Uniform Citation Guide* (NALT 2022), viii <<https://sabilaw.org/wp-content/uploads/2022/06/NALT-Guidebook-as-printed-in-2022-1.pdf>> 5 September 2025.

¹⁵ Nura Garba, 'Osinbajo Unveils Citation Guide for Legal Research in BUK, Says Legal Justice Unattainable without Social Justice' *Bayero University, Kano Official Bulletin* (2022) (xli)(8) of 11th February, 2022 <https://www.buk.edu.ng/sites/default/files/bulletin/2022/friday_11th_february_2022_No_8.pdf> 5 September 2025.

and difficulties for researchers, students and editors.¹⁶ NALT's intervention was therefore timely and necessary.

The Guide adopts a footnote system, rather than an in-text or author-date system, thereby aligning with the practice of most law journals globally. It also emphasises simplicity and economy in punctuation. Thus, abbreviations do not carry full stops, case names are italicised, and the letter "v" in case citations is not punctuated.¹⁷ These choices may appear trivial but they promote a uniform appearance and ease of reading.

In terms of structure, the Guide is divided into sections covering the citation of primarysources (constitutions, statutes, case law, subsidiary legislation) and secondarysources (books, chapters in edited volumes, journal articles, newspapers, and online materials). It also provides tips on short forms, cross-references, and the use of "*ibid.*" for repeated citations.¹⁸

A few examples from the Guide illustrate its method. A case is cited in the following format: *Adegoke Motors v Adesanya* (1989) 3 NWLR (Pt 109) 250. A statute is cited by its short title and year, such as the Companies and Allied Matters Act 2020. A journal article is cited as: A Oyebode, 'The Imperative of Legal Education Reform in Nigeria', *Nigerian African Law Report* (2015) (6) 1.¹⁹

While these rules are clear, precise, and user-friendly, one striking feature is their silence on sources that fall outside the Anglo-American legal tradition. The Guide contains no instructions on citing religious texts, be they the Bible or the *Qur'ān*; no rules on citing *Hadīth*; no provisions for Arabic-language books; and no guidance on bilingual editions. In a legal system where *Sharī'ah* is both taught in universities and practised in courts, this omission is glaring and unwelcomed.

¹⁶n. 1, 315.

¹⁷ NALT Uniform Citation Guide, n. 2, 67.

¹⁸*ibid* 67-81.

¹⁹*ibid* 67-69.

The NALT Guidebook confirms this lacuna. At pages 56 to 81, where it deals with referencing secondary sources,²⁰ there is no mention of *Sharī'ah* materials.²¹ This silence raises the concern that scholars working on Islamic law must either improvise their own methods or borrow from foreign style guides. The result is inconsistency across Nigerian law journals and theses, undermining the very objective of uniformity that NALT set out to achieve.

3. Islamic Law Sources and their Referencing Peculiarities

Islamic law sources are distinctive in form, history, and method. Unlike statutes or case reports, they are not products of a single sovereign authority but derive their authority from divine revelation, prophetic tradition, and centuries of scholarly interpretation. This distinctiveness affects how they should be cited. One author identified some of these unique peculiarities as regard citation.²² The details are reproduced for clarity.

3.1 Referencing the *Qur'ān*

The *Qur'ān* is the foundational source of Islamic law. Unlike statutory compilations, the *Qur'ān* has a fixed canonical structure consisting of 114 *sūrah*s (chapters), each divided into *āyāt* (verses). These divisions are universal and stable across all editions, except the *Ahmaddiyyah* version of the *Qur'ān*.²³ For this reason, international referencing guides such as the Chicago Manual of Style recommend citing the *Qur'ān* by *sūrah* and *āyah*, rather than by page numbers, which vary between translations.²⁴

For example, a verse may be cited as: *Qur'ān* 2:195 or *Surah al-Baqarah* 2:195. When the quotation is taken from a particular English translation, the translator and edition should be mentioned: *Qur'ān* 2:195 or *Surah al-Baqarah* 2:195 (M A S Abdel Haleem (tr), *The*

²⁰ This is not in any way agreeing that *Qur'ān* and *ḥadīth* are secondary sources. They both remain primary source of *Sharī'ah*. See al-Kāsānī, *Badā'i' al-Ṣanā'i' fī Tartīb al-Sharā'i'* (vol 1, Dār al-Kutub al-Ilmiyyah 1986) 5–7; Ibn Rushd, *Bidāyat al-Mujtahid wa Nihāyat al-Muqtaṣid* (Cairo: Maṭba'at al-Sa'ādah 1925) vol 1, 25–27; al-Nawawī, *al-Majmū' Sharḥ al-Muhadhdhab* (vol 1, Dār al-Fikr 1997) 29–31; Ibn Qudāmah, *al-Mughnī* (vol 1, Maktabat al-Qāhirah 1968) 3–4; M H Kamali, *Principles of Islamic Jurisprudence* (3rd edn, Islamic Texts Society 2003) 5–12.

²¹n. 2, 67.

²²n. 1, 313–314.

²³ See Maulawī Sher 'Alī, *Qur'ān Majīd (The Holy Qur'ān)* (Islam International Publications Limited, Islamabad 2021) available at: <<https://www.alislam.org/quran/Holy-Quran-English.pdf>> 4 September 2025.

²⁴Chicago Manual of Style (17th edn, University of Chicago Press 2017) 11 <https://www.mvcc.edu/learning-commons/pdf/Chicago_Manual_of_Style_17_Notes_and_Bibliography.pdf> 5 September 2025.

Qur'an (Oxford University Press 2008)). This method ensures clarity and allows readers to locate the verse in any edition of the *Qur'ān*.

In contrast to the above, the NALT Guide offers no single rule regarding citation of the *Qur'ān*. Without this guidance, although rarely, Nigerian students may cite Qur'ānic verses using page numbers from a translation, leading to confusion when different editions are consulted. This is possible when the NALT that is the fulcrum of Referencing and Citation Styles in Research Methodology Class is bereft of any guidance in that regard.

3.2 Referencing the *Ḥadīth*

The *Ḥadīth*, which represent the sayings, actions, or tacit approvals of the Prophet Muḥammad (peace be upon him) are also a component of the primary source or the second primary source of Islamic law.²⁵ They are compiled in major collections such as *Ṣaḥīḥ al-Bukhārī*, *Ṣaḥīḥ Muslim*, *Sunan Abī Dāwūd*, *Sunan al-Tirmidhī*, *Sunan al-Nasā'ī*, and *Sunan Ibn Mājah*.²⁶ Each collection is arranged into books (*kitāb*) and chapters (*bāb*). Modern editions often include sequential numbering of individual *Ḥadīths*.²⁷

International Islamic law style guides recommend two methods of citation: (i) by collection and *Ḥadīth* number, e.g. *Ṣaḥīḥ al-Bukhārī*, no 6227; or (ii) by collection, *kitāb*, and *bāb*, e.g. *Ṣaḥīḥ Muslim*, *kitāb al-īmān*, *bāb bayān arkān al-islām*.²⁸

²⁵n. 19.

²⁶ See for example: Al-Bukhari Abī Abdullah Muhammad bn Isma'īl, *Ṣaḥīḥ al-Bukhari* (Dār ibn Kathīr, Bayrūt 2002); Muslim bn Hajjāj Abū al-Hassan al-Qushayrī al-Nasāburi, *Ṣaḥīḥ Muslim*, (Bayt al-Afkār al-Dawlīyyah, Riyādh 1998); Nasā'ī Abū Abdulrahman Ahmad ibn Shu'ayb, *Sunnan al-Nasā'ī al-Mujtabah* (Dār al-Tāsīl, Cairo 2012); Tirmidhi Abū 'īsa Muhammad bn 'īsa, *Sunnan al-Tirmidhi* (Dār ilyā al-Turāth al-'arab, Bayrūt n.d.); Abū Dawud Sulaymān bn al-Ash'ath al-Azdi as-Sijistānī, *Sunnan Abī Dawud* (Dār al-Kutub al-'Imiyah, Bayrūt 2011) and Ibn Majjah Abī 'Abdullah Muhammad bn Yazid al-Raba al-Qazwānī, *Sunnan Ibn Majjah* (Maktabah al-Ma'ārif lil-Nashr wa-taozi', Riyādh n.d.) or Mālik bn Anas bn Mālik bn Abī Amir, *Al-Muwaṭ'a* (Majmū'ah al-furqān At-Tujāriyah 2003).

²⁷See Nasiruddin al-Khattab, *English Translation of Ṣaḥīḥ Muslim* (Trans: Imam Abul Hussain bin al-Hajjaj *Ṣaḥīḥ Muslim*) (Vol. I-VII, Maktaba Dar-us-Salam, Riyadh 2007) and Mohammad Moshin Khan, *The Translation of the Meanings of Ṣaḥīḥ al-Bukhari* (Trans: Al-Bukhari, Muhammed Ibn Ismaiel *Ṣaḥīḥ al-Bukhari*) (Vol. I-VII, Maktaba Dar-us-Salam, Riyadh 1997).

²⁸ See *Jurnal Syariah Writing Styles* <<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://ejournal.um.edu.my/index.php/JS/issue/view/1671&ved=2ahUKEwjexOzQhcKPAxWRRUEAHUUNMIQFnoECC0QAQ&usg=AOvVaw3llyJ7TSPwwOlv7iJxOrz>> 5 September 2025.

The absence of a NALT model for *Ḥadīth* creates problems. A student citing *Ṣaḥīḥ Muslim* may give only the page number of a particular edition, making it impossible for another scholar using a different edition to trace the report. When the *Ḥadīth* number is used, one cannot be sure whether the number is the traditional numbering of the classical collection numbering. This is a great confusion that undermines scholarly verifiability.

3.3 Citing Classical Arabic Works

Beyond the *Qurʾān* and *Ḥadīth*, Islamic law relies on centuries of scholarly writing in Arabic. Classical works such as Ibn Qudāmah's *al-Mughnī* and al-Shāfi'ī's *al-Umm* exist in multiple manuscript traditions and modern printed editions. Proper citation therefore requires details of the editor, edition, publisher, year, and the specific volume and page.²⁹ This is apart from the difficulty associated with the manner of writing authors name, when the usual names adopted by most authors of classical books is very long. Such detail is necessary to identify the exact edition used, as variations exist between prints.

For instance, Ibn Qudāmah is popular with this short name. His full names are Abū Muḥammad 'Abd Allāh ibn Aḥmad ibn Muḥammad ibn Qudāmah al-Maqdisī. Abu al-Abbas, Shihāb al-Din Ahmad bin Ahmad bin Salamah, al-Qalyūbi is simply popular with Imam al-Qalyūbi. There is need for NALT to specify how exactly the name should be written. Is it the full name, the popular name or what?

The date is another area that smear uncertainty in traditional Arabic literatures. While some classical Arabic text has no publication dates, those that have are usually written in *hijri* calculation.³⁰ Should a researcher adopt the *hijri* date? In which case it may cause confusion and be taken as Gregorian, which is the popular among researchers. Should the date be converted to the Gregorian calculation? Confusion will still erupt, as verification through the date will be difficult. Perhaps, the *hijri* date should be adopted and identified as so. The NALT Guide contains no model for such citations, leaving Nigerian scholars to guess.

²⁹See Abū Muḥammad 'Abd Allāh ibn Aḥmad ibn Muḥammad ibn Qudāmah al-Maqdisī, *al-Mughnī* (vol 1-15 Maktabat al-Qāhirah 1968) and Abū 'Abd Allāh Muḥammad ibn Idrīs al-Shāfi'ī, *al-Umm* (vol 1-8 Dār al-Ma'rifah 1990).

³⁰n. 1, 315.

3.4 Modern Arabic and Bilingual Literature

Just like the case of Classical Arabic works, contemporary Arabic scholarship, poses its own challenges, this is apart from inheriting the difficulties associated with Classical Arabic literatures. Classical works such as Wahbah al-Zuhaylī's *al-Fiqh al-Islāmī wa Adillatuhu*,³¹ and Ibn Rushd's *Bidāyah al-Mujtahid wa-Nihāyah al-Muqtaṣid*³² can be cited as an example of Arabic works that inherited the difficulties associated with the classical literature, as identified in this work.

Some of this works also have their English and other language translation. A section of the work of al-Zuhaylī's *al-Fiqh al-Islāmī wa Adillatuhu* has been translated into English.³³ Ibn Rushd's *Bidāyah al-Mujtahid wa-Nihāyah al-Muqtaṣid* also has English translation.³⁴ While it is agreeable that the translations can be cited as separate book of their own adopting NALT Guide, there are also literature that insert the English interpretation into the Arabic works, like the translation of the *Ḥadīth* collections.³⁵

Apart from the issue of authors name and date of publication, should the Arabic title be written alongside the English title or italicised? Should the name be transliterated or given in an Anglicised form? What about bilingual editions where the Arabic text and English translation appear side by side? These questions require clear rules. Unfortunately, the NALT Guide is bereft of any information that may serve as suitable guidelines for citing literature of this nature. Guess becomes inevitable and uniformity can therefore not be achieved .

3.5 *Fatwā* Collections and Online Resources

In this global era, with the proliferation of online *fatwā* repositories maintained by official *iftā'* bodies or private institutions, citation rules must equally adapt.³⁶ A *fatwā* is not a journal article

³¹ Wahba Zuhayli, *Fiqh al-Islāmī Wa-addilatuh* (2nd ed, vol 1-5 *Dār al-Fikr*, Damascus 1985)

³² Ibn Rushd al-Qurṭabī al-Andalusī, *Bidāyah al-Mujtahid wa-Nihāyah al-Muqtaṣid* (vol. 1-2, *Dār al-Fikr*, Lebanon 2008).

³³ Mohammad Amin El-Gamal, *Financial Transactions in Islamic Finance* (Trans. of Dr. wahbah Az-Zuhayli's *al-Fiqh al-Islāmī Wa-addilatuh* 'Islamic Jurisprudence and its Proofs')(vol. 1-2, Dar al-Fikr, Damascus 2002).

³⁴ Imran Ahsan Khan Nyazee, *The Distinguished Jurist's Primer* (vol 1-2, Garnet Publishing, n.d.).

³⁵n. 26.

³⁶see for example: Dar al-Iftā' al-Miṣriyyah (Egypt), *Fatwā Library* (accessible via Dar al-Iftā' website, 25 October 2025) <https://www.dar-alifta.org/en/fatwa> accessed 25 October 2025; Islam QA (Islam Question & Answer), *Repository of Islamic Q&A & Fatwā* (English version) <https://islamqa.info/en> accessed 25 October 2025; IslamWeb, *Fatwā Center* <https://www.islamweb.net/en/fatawa/> accessed 25 October 2025; Al-Maqasid Foundation (Fatwa &

nor a statute, yet it is a primary source for many contemporary *Sharī'ah* rulings. Citing a *fatwā* requires the name of the issuing body, the title (if any), the date, the portal name, the URL, and the date accessed.

The NALT Guide has generic rules for online sources but provides no category exemplars for *fatwā*. Scholars are thus left in doubt as to whether a *fatwā* should be cited like a newspaper article, a website, or a case law report.

4. NALT Shortcomings vis-à-vis *Sharī'ah* References

A referencing style that seeks uniformity must be holistic. The NALT Uniform Citation Guide, however, while commendable in its scope for common law and statutory materials, suffers from profound shortcomings in its engagement with *Sharī'ah* sources. These shortcomings can be grouped into several categories.

The foremost shortcomings of NALT in relation to *Sharī'ah* References is its silence on how to cite the *Qur'ān*. The *Qur'ān* is the primary source of Islamic law, but the Guide does not provide any rule for citing it. As a result, Nigerian legal writers are left to improvise. Some resort to citing the *Qur'ān* as if it were a book, giving the translator and page number; others merely write “*Qur'an*” in-text without a footnote. This inconsistency is not trivial: it undermines clarity, as readers may not know which edition or translation has been used.³⁷

Moreover, citation by page number is problematic because pagination varies across translations. A verse appearing on page 38 in one edition may be on page 42 in another. Only the universal numbering by *sūrah* and *āyah* guarantees accuracy and verifiability. By failing to prescribe such a standard, NALT risks entrenching imprecision.

Relating to the above shortcoming is the neglect of the proper mode for referencing *Ḥadīth* literature. The *Ḥadīth* are the second pillar of *Sharī'ah*, complementing the *Qur'ān* as the primary source of *Sharī'ah*. Their role in Nigerian *Sharī'ah* institutions and courts is well documented, and

Research Department), *Fatwā & Research* <https://www.almaqasid.org/fatwa> accessed 25 October 2025; Darul Uloom Deoband Online Fatwa Dept. (India), *Darulifta-Deoband.com* (English/Urdu *Fatwās*) <https://darulifta-deoband.com/en> accessed 25 October 2025.

³⁷WA Shadid and PS van Koningsveld, *The Qur'an in its Historical Context* (Brill 2008) 91.

they form the backbone of many academic writings. Yet NALT offers no model for citing *Ḥadīth*. Without clear rules, writers cite them in divergent and confusing ways: some use page references, others use only the title of the collection, and some adopt numbering systems not explained to the reader.³⁸

This neglect creates two problems. First, it makes verification difficult, as a *Ḥadīth* report may appear in different places and in different editions. Secondly, it diminishes the seriousness with which *Sharīʿah* materials are treated, suggesting they are peripheral to Nigerian law when in fact they are constitutionally recognised and judicially enforceable.

Another noticeable deficiency in NALT Reference Guide is the lack of transliteration guidance for Arabic words. Arabic names and titles require consistent transliteration. Without rules, writers oscillate between different systems: “al-Ghazali” in one text, “al-Ghazzālī” in another, and “Algazel” in older European works. A referencing style must specify whether diacritics are required, whether the definite article “al-” should be capitalised, and how to order Arabic names in bibliographies. The absence of such rules in NALT invites rampant inconsistency.³⁹

Further, the ambiguity created in citing classical and modern Arabic works is another shortfall for NALT. *Sharīʿah* scholarship is not only ancient but also contemporary. Classical works like *al-Mughnī* coexist with modern encyclopaedias such as Wahbah al-Zuhaylī’s *al-Fiqh al-Islāmī wa Adillatuhu* and a host of others. How should these be cited? Should the Arabic title be given in italics, with a translation in square brackets? Should the editor of the edition be acknowledged? The Guide offers no answer.

In practice, some Nigerian law theses cite only the translated title, while others include the Arabic script, and others merely give the author’s name and page number. Such diversity is inconsistent with the uniformity NALT seeks.

The NALT Guide is also inadequate by ignoring *Fatwā* and Digital *Sharīʿah* Resources in its guidance. In the digital era, *fatwā* repositories, online *tafsīr* portals, and electronic databases such as *al-Maktabah al-Shāmilah* are central to Islamic legal research. A student may need to cite a

³⁸ See M al-Albānī, *Silsilat al-Aḥādīth al-Ṣaḥīḥah* (al-Maktab al-Islāmī 1985) vol 2, 34.

³⁹ A Abd-Allah, *Mālik and Medina: Islamic Legal Reasoning in the Formative Period* (Brill 1997) 19–21.

fatwā issued by the Egyptian *Dār al-Iftāʾ* or a ruling on IslamQA. Yet NALT has no category for such references. Writers are forced to improvise, sometimes treating a *fatwā* as though it were a newspaper article, at other times as a generic website.⁴⁰

These omissions are not merely technical. They affect the credibility of Nigerian *Sharīʿah* scholarship. When readers, especially international scholars, encounter inconsistent, imprecise, or opaque references, they may doubt the reliability of Nigerian Islamic legal research. This undermines both the individual researcher and the reputation of Nigerian legal academia. Moreover, the lack of guidance frustrates students and supervisors, creating unnecessary disputes in thesis examinations and journal reviews.⁴¹

5. Comparative Lessons and Practical Implications for Nigerian Legal Academia

Oxford Standard for the Citation of Legal Authorities (OSCOLA) and the Chicago Manual of Style offers comparative lessons in their provisions, albeit minimal, as it has model for citing religious texts and recommend indicating where citation is used. These accommodate diversity and plurality of legal scholarship. If NALT is to serve the plural legal reality of Nigeria, it must learn from other referencing traditions that have grappled with religious and non-Western sources.

OSCOLA, which widely used in the UK, provides models for citing religious texts. For example, the Bible, it prescribes book, chapter, and verse (e.g., Genesis 1:1), and it has a note for the *Qurʾān*, recommending *sūrah* and *āyah* (e.g., *Qurʾān* 2:256).⁴² Although its guidance is brief, it demonstrates that religious texts deserve explicit rules. On the other hand, Chicago Manual of Style devotes an entire section to citing sacred texts. It advises against page numbers, prescribes canonical divisions (e.g., *Qurʾān* 5:32), and recommends indicating the translation used.⁴³ This shows the value of recognising the unique nature of such texts.

Apart from the above, there are specialist guides, such as the Islamic Law Citation Guide developed by Harvard's Islamic Law Blog. This guide provide detailed models for citing *Qurʾān*,

⁴⁰M Hallaq, *Authority, Continuity and Change in Islamic Law* (Cambridge University Press 2001) 62–65.

⁴¹A Yadudu, 'Sharīʿah and Legal Education in Nigeria' (2010) 3(1) Bayero Journal of Law 1, 12.

⁴²OSCOLA (4th edn, Oxford University Faculty of Law 2012) 44.

⁴³Chicago Manual of Style (n 7) 735.

ḥadīth, classical Arabic works, and online *fatwā*.⁴⁴ The guide illustrate that clarity and uniformity can be achieved through the guide without complexity. Citation guides from journals like Journal of College of Sharia and Islamic Studies, Qatar,⁴⁵ *Jurnal Syariah*,⁴⁶ and Journal of *Shariah* Law Research, Kuala Lumpur⁴⁷ etc. have their unique referencing styles, which are provided on their websites or portal as part of the information and guidelines for prospective authors of their journals. One unique feature in all these special referencing styles is, the recognition of the disparity in the manner and styles of writing books, journals and periodicals etc. for both Islamic and non-Islamic literatures, and the acceptance of the unique appearance of the modes of writings in Islamic Law. Some of these Journal outlets provide specifically for the required style of referencing Islamic literature in recognition of its unique nature and also specify the transliteration model for Arabic Letters.⁴⁸

Consequent upon the above comparative, which are clear and unambiguous: there is need for NALT to expand its scope to include *Sharī'ah* materials. Doing so would not only acknowledge the pluralism of Nigerian law and her scholarship; but also create standardise citation of *Qur'ān*, *Ḥadīth*, Arabic books, and *fatwa* etc. To this end, it will also enhance the credibility of Nigerian scholarship internationally; and relieve students and supervisors of confusion and dilemma.

Further, the practical implications of considering these comparative are significant. Law faculties in northern Nigeria, where *Sharī'ah* is taught as a core subject, would benefit from consistency. Journals that publish Islamic law articles would no longer need to invent ad hoc rules. Examiners of postgraduate theses would have a common standard. In the long run, Nigerian scholarship would gain international respect by demonstrating precision in engaging with *Sharī'ah* sources.

6. Conclusion and Recommendations

This article has argued that while the NALT Uniform Citation Guide is a laudable achievement in harmonising legal referencing in Nigeria, it falls short in addressing the unique needs of *Sharī'ah*

⁴⁴Harvard Islamic Law Project, *Citation Guide* (Harvard Law School 2020) 5–12.

⁴⁵Journal of College of Sharī'ah and Islamic Studies, Citation Guide <<https://journals.qu.edu.qa/index.php/sharia/submission/authorGuidelines> > 5 September 2025.

⁴⁶*Jurnal Syariah* Writing Style <<https://ejournal.um.edu.my/index.php/JS/guidelines> > 5 September 2025.

⁴⁷Journal of Sharī'ah Law Research, Writing Style <<https://ejournal.um.edu.my/index.php/JSLR/issue/view/2053/741> > 5 September 2025.

⁴⁸n. 1, 310.

scholarship. Its silence on *Qur'ān*, *ḥadīth*, Arabic works, transliteration, and *fatwā* is a serious lacuna that undermines the credibility of Nigerian Islamic law research.

The research therefore recommend that NALT should be amended to do the following:

1. Introduce explicit rules for the citation of *Qur'ān*. Verses should be cited by *sūrah* and *āyah*, with the translation specified.
2. Provide models for *Ḥadīth* referencing. Citations should include the collection, *kitāb*, *bāb*, and/or *Ḥadīth* number, with details of the edition used.
3. Establish transliteration standards. NALT should adopt a simple but consistent system for Arabic names and titles, such as the Library of Congress transliteration.
4. Create rules for classical and modern Arabic works. NALT citations guide for classical and modern Arabic literature should include the author, title (italicised, with English translation in brackets), editor (if applicable), publisher, year, and volume/page.
5. Recognise *fatwā* and online *Sharī'ah* resources. These should be cited with details of the issuing body, date, title, URL, and date accessed.

Adopting the above recommendations will encourage inclusivity. By adopting these rules, NALT will not only enrich its Guide but also reflect Nigeria's plural legal system, promote uniformity, and enhance the international standing of Nigerian scholarship. In conclusion, law is a discipline of precision, and referencing is its grammar. Just as no English sentence is complete without grammar, no Nigerian legal scholarship can be complete without proper citation of all its legal traditions. By embracing *Sharī'ah* sources within its referencing style, NALT will truly embody the diversity and richness of Nigerian law.