



12 December 2023

Danish National ID Centre

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Ghana: Divorce registration and divorce certificates

Introduction

The following note describes the different divorce procedures in Ghana and identifies what constitutes a valid divorce registration.

The information in the note is primarily based on interviews conducted in Accra, Ghana in December 2021. The interviewed sources are Chief Justice of the Supreme Court and the Islamic Research Institute.

The appendix includes a range of different Ghanaian divorce certificates.

Administrative structure and legislation related to divorce

Ghana is divided into 16 administrative regions.¹ At the local level, Ghana is divided into 261 metropolitan, municipal and district assemblies.² The judicial system in Ghana consists of a five-layer hierarchy: district court, circuit court, high court, court of appeal and Supreme Court. The district court is the lowest in the hierarchy of the five courts while the Supreme Court is the highest.³

There are three types of divorce recognised by Ghanaian law: ordinance, customary and Islamic.⁴ There is no uniform way of divorce and the customs depends on the community.⁵ The Matrimonial Causes Act 1971 (Act 367) provides that marriages under the Marriage Ordinance, customary marriages and Islamic marriages can be dissolved before the court who must take local traditions into consideration when assessing the validity of the divorce.⁶

Ordinance divorce

Matrimonial Causes Act 1971 (Act 367) regulates dissolution of marriage contracts in accordance with the Marriage Ordinance. Either one of the spouses can petition

¹ CIA World Factbook, 18 January 2022.

² Accra Metropolitan Assembly, 2021.

³ The Republic of Ghana Judiciary, year of issue n/a.

⁴ Kumasi Metropolitan Assembly, 2021.

⁵ Supreme Court, Accra, 2021.

⁶ Matrimonial Causes Act, 1971, 41; U.S. State Department, year of issue n/a; Mondaq, 19 June 2020.

for divorce at the court.⁷ It is unclear which court handles the dissolution of ordinance marriages. According to the Danish Immigration Service, it is the high court, not the district court, who handles ordinance divorces.⁸ Meanwhile, the U.S. State Department claims that ordinance marriages can be dissolved by a high court or district court in the district where the petitioner(s) reside.⁹ However, the Danish National ID Centre has also received a specimen of a divorce certificate issued by the circuit court. Hence, it is the Danish National ID Centre's impression that the district court, circuit court and high court all dissolve ordinance marriages.

The sole ground granting a petition for divorce is that the marriage has broken down beyond reconciliation. Both spouses do not have to be present to petition for divorce.¹⁰ The document 'Petition for Divorce' does not make the divorce final. Once the court is convinced that the marriage is broken down beyond reconciliation, the petition for divorce is accepted.¹¹ The court issues a 'certificate of the dissolution of marriage' or a 'divorce certificate' to the divorced couple. See Appendix A and B for examples. The judge needs to sign the actual divorce certificate for the divorce to be final.¹²

A court order can be provided if requested – see Appendix C for an example of a court order. The court order is not issued by default because it is not mandatory. In contrast to the 'certificate of the dissolution of marriage' and 'divorce certificate,' which is a single piece of paper, the court order is usually several pages long. The court order contains a detailed description of the divorce. The question of child custody will also be addressed in the court order, if children are involved.¹³

A certified copy of the divorce certificate can be issued upon request. For the certified copy, you have to apply through the registrar of the court. All court rulings are stored in an archive and goes back 40-50 years. The certified copy is issued based on the old ruling in the archive.¹⁴

To use the divorce certificate abroad you need an attestation by a notary public (stamp) and a legalisation from the Ministry of Foreign Affairs. Often you also need a certification from the embassy representing the country where the divorce certificate is to be used.¹⁵

Customary divorce

Customary divorce is considered a family matter and is often taken care of without involving the authorities or court.¹⁶ Both parties can dissolve a customary marriage.

⁷ Matrimonial Causes Act, 1971, 1. (1).

⁸ Danish Immigration services, 11 July 2006, p. 11.

⁹ U.S. State Department, year of issue n/a.

¹⁰ Supreme Court, Accra, 2021.

¹¹ Danish Immigration Services, 11 July 2006, p. 12.

¹² Supreme Court, Accra, 2021.

¹³ Supreme Court, Accra, 2021.

¹⁴ Supreme Court, Accra, 2021.

¹⁵ Supreme Court, Accra, 2021.

¹⁶ The Danish Immigration Service, 11 July 2006, p. 14; Supreme Court, 2021.

Grounds for divorce in customary marriages includes infertility, adultery, impotency, or if the couple is not compatible. According to customary rules, a marriage is dissolved once the family members have distributed the jointly acquired property between the spouses – how much property or compensation the spouses get depends on how many wives the man has.¹⁷ However, this is not a legally valid divorce in the eyes of the court. According to the Supreme Court, customary divorces must be registered at the district court to be valid.¹⁸ However, the Danish National ID Centre's have a specimen of a court order for the dissolution of a customary marriage issued by the high court.

To make the customary divorce valid, the spouses need to bring an attestation from the family council or a statutory declaration to petition for dissolution of customary marriage at court.¹⁹ The attestation and statutory declaration does not constitute a valid divorce.²⁰ The district court is enjoined to consider the customary rules of the parties when dealing with dissolution of customary marriages.²¹ The court will determine if there is sufficient evidence of the divorce. The determination of whether the marriage is dissolved is assessed based on the local traditions in the spouses' community. The district court will issue a divorce certificate once the petition for divorce has been granted.²² The Danish National ID Centre does not have a specimen of a customary divorce certificate.

Islamic divorce

Islamic marriages and divorces are carried out in accordance with the Marriage of Mohammedans Ordinance cap. 129, which is a part of Marriage Act 1884-1985 cap. 127.²³ According to the Danish Immigration Services, there was a disconnection between registration practises and the law. The Islamic community in Ghana was therefore compelled to establish their own registration procedures, making it possible to register Islamic marriage and divorce.²⁴ The Islamic Research Institute is a result of this and makes registration of both marriage and divorce available to all sects of Islam, including, Shia, Sunni and Ahmadiyya.²⁵ The following descriptions of the registration procedures for Islamic divorce only paints a picture of how the Islamic Research Institute register divorce.

Islamic Research Institute refers to Sharia law when they describe that both men and women have rights when it comes to divorce. There exists three types of divorce according to Sharia:²⁶

¹⁷ Kumasi Metropolitan Assembly, 2021.

¹⁸ Supreme Court, Accra, 2021.

¹⁹ Supreme Court, Accra, 2021; The Danish Immigration Services, 11 July 2006, p. 14; U.S. State Department, year of issue n/a; Marriage Act, 1884-1985 Cap. 127, 7. (2).

²⁰ U.S. State Department, year of issue n/a.

²¹ Kumasi Metropolitan Assembly, 2021.

²² Supreme Court, Accra, 2021.

²³ The Danish Immigration Service, 11 July 2006, p. 15.

²⁴ The Danish Immigration Service, 11 July 2006, p. 16.

²⁵ Islamic Research Institute, Accra, 2021.

²⁶ Islamic Research Institute, Accra, 2021.

- 1) *Talaq* – husband divorcing the wife
- 2) *Khulk* – wife divorcing the husband
- 3) *Faskh* – authorities dissolving the marriage

Talaq is the husband's right to divorce the wife. However, the husband needs to have his reasons for divorce. In cases where both spouses have lost interest, the imam will let the husband know about his rights to initiate divorce, *talaq*.²⁷

For *talaq* to be valid there is a three months, 90 days, waiting period (*idda*). During the waiting period, the spouses are not allowed to be intimate together. The Islamic Research Institute issues a 'notice of commencement of *idda*', stating the reason for the wish to divorce and the time-period of *idda* (see Appendix D). The marriage is considered valid during the entire waiting period. The divorce is final after the 90 days waiting period if the couple were not intimate together, and the Islamic Research Institute will then proceed to the issuance of the divorce certificate. The Islamic Research Institute will not issue the divorce certificate before the *idda* is over – not even one day before.²⁸

When the divorce is decided, the wife will have to leave the household. It is called that the woman is 'seen off.' Before the Islamic Research Institute issues the divorce certificate, they try to reach a settlement regarding the jointly acquired property. Through negotiation it is decided what the woman can bring when she leaves – sometimes this might be a gift.²⁹ The Islamic Research Institute issues the divorce certificate when a settlement has been reached (Appendix E and F).

Khulk is when the wife divorces the husband. Reasons for divorce may be that the wife has lost interest in the husband. In that case, the woman needs to pay the dowry back to the husband. If the wife wants a divorce because the husband is violent, then she does not have to give back the dowry. The waiting period for *khulk* is one month, according to the Islamic Research Institute.³⁰ However, the *khulk* divorce certificate (Appendix G) states that the waiting period is three months.

Faskh is carried out when the marriage is toxic and violent. In that case, the Islamic Research Institute annuls the marriage. The waiting period for *faskh* is one month. In criminal cases, such as killing or rape, the case goes to court. The Institute does not handle such cases.³¹

The divorce certificate is very important in the Islamic community, because it tells who is unmarried; hence available for new marital approaches.³² It is therefore to be expected that a divorcée possesses a divorce certificate.

²⁷ Islamic Research Institute, Accra, 2021.

²⁸ Islamic Research Institute, Accra, 2021.

²⁹ Islamic Research Institute, Accra, 2021.

³⁰ Islamic Research Institute, Accra, 2021.

³¹ Islamic Research Institute, Accra, 2021.

³² Islamic Research Institute, Accra, 2021.

Even though the divorce certificates issued by the Islamic Research Institute are not officially recognised, many Ghanaian authorities accept them.³³ To be legally valid in the eyes of the court, however, the Islamic divorce must be registered at the district court.³⁴ Either party, the husband or wife, can register the dissolution of an Islamic marriage at court within one month of the divorce.³⁵

For a divorce to be valid abroad, it has to be legalised by the Ministry of Foreign Affairs in Ghana.³⁶

Verification of court documents

According to the U.S. State Department, divorce certificates issued by courts that are not in the jurisdiction of residence of the petitioners should be considered suspicious.³⁷

When you want to verify court documents, you need access to the archives with the court rulings. This can be done by contacting the Judicial Secretary, who can check if the court order in question was ruled on that day by that particular judge. The contact has to be in writing.³⁸

According to Transparency International's Corruption Perception Index 2021, Ghana ranks as number 73 out of 180 countries with 43 points out of 100 with zero being very corrupt.³⁹

³³ The Danish Immigration Service, 11 July 2006, p. 16.

³⁴ Supreme Court, Accra, 2021.

³⁵ Marriage Act, 1884-1985 Cap. 127, 26. (1); The Danish Immigration Service, 11 July 2006, p. 15; U.S. State Department, year of issue n/a.

³⁶ Islamic Research Institute, Accra, 2021.

³⁷ U.S. State Department, year of issue n/a.

³⁸ Supreme Court, Accra, 2021.

³⁹ Transparency International, 2020.

References

Oral sources

Islamic Research Institute (December 2021): Interviewed in Accra, Ghana.

Supreme Court (December 2021): Interviewed in Accra, Ghana.

Written sources

Accra Metropolitan Assembly (2021): Accra Metropolitan Assembly, <https://ama.gov.gh/theassembly.php>, retrieved 14 January 2022.

CIA World Factbook (18 January 2022): Ghana, [Ghana - The World Factbook \(cia.gov\)](https://www.cia.gov/library/publications/the-world-factbook/countries/ghana/), retrieved 31 January 2022.

Danish Immigration Services (11 July 2006): Familieret og verifikation af dokumenter samt behandlingsmuligheder m.m. i Ghana, <https://us.dk/publikationer/2006/juli/familieret-i-ghana-2006/>, retrieved 14 January 2022.

Kumasi Metropolitan Assembly (2021): Marriage Services, kma.gov.gh/kma/?marriage-services&page=5354, retrieved 19 January 2022.

Matrimonial Causes Act, 1971 (Act 367) (1971): [548edc3d17.pdf \(refworld.org\)](https://refworld.org/docid/548edc3d17.pdf), retrieved 19 January 2022.

Marriage Act, 1884-1985 Cap. 127: <https://www.refworld.org/pdfid/548edd8f4.pdf> retrieved 19 January 2022, retrieved 14 February 2022.

Mondaq (19 June 2020): Ghana: Grounds For Divorce In Ghana: - The Basics, <https://www.mondaq.com/family-and-matrimonial/742702/grounds-for-divorce-in-ghana--the-basics>, retrieved 14 February 2022.

The Republic of Ghana Judiciary (year of issue not available): District court, <https://judicial.gov.gh/index.php/the-district-court>, retrieved 14 January 2022.

Transparency International (2021): Corruption Perceptions Index, <https://www.transparency.org/en/cpi/2021>, retrieved 16 February 2022.

U.S. State Department (year of issue not available): Ghana, [Ghana \(state.gov\)](https://www.state.gov/ghana/), retrieved 19 January 2022.

Appendix A

Certificate of Dissolution of Marriage. (NIDC reference material)

JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GHANA

SUIT NO. [REDACTED]

ACCRA [REDACTED] PETITIONER

VRS. [REDACTED] RESPONDENT

ACCRA [REDACTED]

[SGD.]
H.L. JUSTICE JENNIFER A. TAGOE (MRS).
(JUSTICE OF THE HIGH COURT)

**CERTIFICATE OF DISSOLUTION
OF MARRIAGE**

This cause having come on before this Honourable Court for hearing and determination; And the Court having on the [REDACTED] day of [REDACTED] 2018, entered Judgment herein:

IT IS HEREBY ORDERED that, the marriage celebrated between the Petitioner [REDACTED] and the Respondent [REDACTED] under the Marriage Ordinance (Cap. 127) at the [REDACTED] Accra, on the [REDACTED] day of [REDACTED] be and is hereby dissolved for having broken down beyond reconciliation.

GIVEN UNDER MY HAND AND THE SEAL OF THE
HIGH COURT OF JUSTICE, ACCRA, THIS [REDACTED]
DAY OF [REDACTED] 2018.

CERTIFIED TRUE COPY

REGISTRAR
HIGH COURT
DIVORCE & MARITAL CAUSE
LAW COURT COMPLEX, ACCRA

CERTIFIED TRUE COPY

[SGD.]
MR. EKOW DZIMM MENSAH-ATTAH
(REGISTRAR)

REGISTRAR
HIGH COURT
DIVORCE & MARITAL CAUSE
LAW COURT COMPLEX, ACCRA

M.N.T.A

Appendix B

Certificate of Divorce. (NIDC reference material)

IN THE CIRCUIT COURT OF GHANA
ACCRA

SUIT NO. [REDACTED]

[REDACTED]
ACCRA PETITIONER

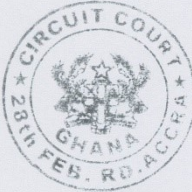
VRS

[REDACTED]
ACCRA RESPONDENT

=====

CERTIFICATE OF DIVORCE

=====


(SGD)
H/H. SAMUEL BRIGHT ACQUAH
CIRCUIT COURT JUDGE

THIS ACTION having come before this Honourable Court for hearing and determination and the Court having on the [REDACTED] 2020 entered judgment for the Petitioner herein.

IT IS HEREBY DECREED that the Marriage which was solemnised on [REDACTED] at the [REDACTED] Accra under the Marriage Ordinance (Cap 127) between [REDACTED] the Petitioner herein and [REDACTED] the Respondent herein be and is hereby dissolved on the grounds that the marriage has broken down beyond reconciliation.

GIVEN UNDER MY HAND AND THE SEAL OF THE CIRCUIT COURT ACCRA THIS [REDACTED] 2020.


CERTIFIED TRUE COPY
REGISTRAR
CIRCUIT COURT
ACCRA
NT

(SGD)
J.K.O. DANIELS
REGISTRAR



JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA

Appendix C

Court order for the dissolution of a customary marriage. (NIDC reference material)

JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA

IN THE SUPERIOR COURT OF JUDICATURE, IN THE HIGH COURT OF JUSTICE (DIVORCE & MATRIMONIAL DIVISION) SITTING IN ACCRA ON [REDACTED] 2021 BEFORE HER LADYSHIP JUSTICE JENNIFER AKUA TAGOE (MRS.)

SUIT NO. [REDACTED]

[REDACTED] ... **PETITIONER**

VRS. [REDACTED] ... **RESPONDENT**

J U D G M E N T

The Petitioner seeks the following reliefs:

- (a) A confirmation that the customary law marriage between the Petitioner and the Respondent celebrated on the [REDACTED] [REDACTED] has indeed been dissolved on the [REDACTED] [REDACTED]
- (b) A declaration that the unnumbered house, lying and situate at [REDACTED] and in which the Respondent currently lives, is the joint property of the Petitioner and Respondent herein.
- (c) An order that the said house described in paragraph 25 (b) herein be valued and sold and the Petitioner be paid one half of the value of the said house or in the alternative;
- (d) The Respondent buys out the Petitioner's one half interest in the said house

CERTIFIED TRUE COPY

[Signature]
REGISTRAR
HIGH COURT
DIVORCE/MATRIMONIAL, ACC-ACCRA

1

JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA JUDICIAL SERVICE OF GHANA

Appendix D

Certificate of waiting period (*idda*). (NIDC reference material)

AHLUSSUNNA WAL JAMA'A

National Headquarters

المقر الرئيسي لأهل السنة و الجماعة

This document has been issued without any alteration or erasure.

Any alteration or erasure therefore renders it invalid.

An embossed seal of the above office is also affixed at the lower right corner of this document.

No: [REDACTED] THIS IS A 1 (ONE) PAGE DOCUMENT page 1 of 1

NOTICE OF COMMENCEMENT OF IDDA (WAITING PERIOD) PENDING DISSOLUTION OF MARRIAGE

This is to inform [REDACTED] and to anyone concerned that [REDACTED] presently residing at Bortianor, a suburb of Greater Accra Region (to whom [REDACTED] is married as per the Sharia) has been instructed to commence Idda (waiting period) pending the dissolution of their marriage.

DETAILS

[REDACTED] lodged a complaint on the state of his marriage to [REDACTED] is requesting for a divorce.

Based on [REDACTED] stand, the above institution has instructed [REDACTED] in accordance with the Sharia (**Islamic Law**) to enter into Idda, (**waiting period**) pending the dissolution of marriage. This covers a period of three (3) months with effect from [REDACTED]

[REDACTED] or anyone concerned are to present their objection, if any against this verdict within the stated period. Their failure to do so render the marriage legally dissolved after [REDACTED] according to the Sharia.

.....
(Sheikh Hussein Abdul Rahman)

ARBITRATOR

Issued on this [REDACTED] 2021 corresponding to [REDACTED]

AHLUSSUNNA WAL JAMA'A
NATIONAL HEADQUARTERS
P. O. BOX NM 410
NIMA - ACCRA
GHANA

الطلاق مرتان فإمساكاً بمَعْرُوفٍ أَوْ تَسْرِيحٌ بِإِحْسَنٍ (سورة البقرة ٢٢٩)

A divorce is only permissible twice; after that, the parties should either hold together on equitable terms, or separate with kindness. (Holy Qur'an Chapter 2- al-Baqaruf: 229)

Appendix E

Islamic divorce certificate (*talaq*). (NIDC reference material)

AHLUSSUNNA WAL JAMA'A

National Headquarters

المقر الرئيسي لأهل السنة و الجماعة

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No: MR/348/2020 THIS IS A (ONE) PAGE DOCUMENT page 1 of 1

CERTIFICATE OF DISSOLUTION OF MARRIAGE **BETWEEN MR. MAN AND MADAM WOMAN**

This is to inform anyone concerned that the marriage between the above has been dissolved.

The dissolution was at the request of the ex-husband (MR. MAN) on the following grounds:

1. The ex-husband (MR. MAN) complained that he was no longer interested in the marriage.
2. The husband said he had lost interest in the marriage soon after the marriage was done.
3. He is a traveller and he sometimes stays for about a year or more outside the country which his wife is not comfortable with.

The marriage between MR. MAN and MADAM WOMAN has therefore been dissolved as stipulated by the sharia (Islamic law) effective from 25th November, 2020.

(Sheikh Umar Ibrahim Imam)

NATIONAL IMAM

Issued on this Thursday 26th November, 2020 corresponding to 10th Jumaada II 1442AH.

AHLUSSUNNA WAL JAMA'A
NATIONAL HEADQUARTERS
P. O. BOX NM 410
NIMA - ACCRA
GHANA

الطلاق مرتان فإمساككم بمعهروك أوتنزيح بإحسان (سورة البقرة ٢٢٩)

A divorce is only permissible twice; after that, the parties should either hold together on equitable terms, or separate with kindness. (Holy Qur'an Chapter 2- al-Baqarah: 229)

Appendix F

Islamic divorce certificate (*talaq*). (NIDC reference material)

AHLUSSUNNA WAL JAMA'A

National Headquarters

المقر الرئيسي لأهل السنة و الجماعة

This document has been issued without any alteration or erasure.

No: MR/390/2021 THIS IS A (ONE) PAGE DOCUMENT page 1 of 1

CERTIFICATE OF DISSOLUTION OF MARRIAGE **BETWEEN MR MAN AND MADAM WOMAN**

This is to inform anyone concerned that the marriage between the above has been dissolved.

The dissolution was at the general consensus of both couples (MR MAN & MADAM WOMAN) on the following grounds:

1. The both ex-couples (MR MAN & MADAM WOMAN) complained that they are no longer interested in the marriage.

Based on the sharia (Islamic law) the ex-wife (MADAM WOMAN) was put on 'idda' (waiting period) for a period of three (3) month effective from 1st August, 2021 to 1st December, 2021.

The marriage between MR MAN and MADAM WOMAN has therefore been dissolved as stipulated by the sharia (Islamic law) effective from 24th June, 2021.

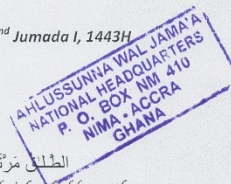
Any alteration or erasure therefore renders it invalid.

An embossed seal of the above office is also affixed at the lower right corner of this document.

(Sheikh Umar Ibrahim Imam)

NATIONAL IMAM

Issued on this Monday, 6th December, 2021 corresponding to 2nd Jumada I, 1443H.



الطَّلَاقُ مَرَّتَانٍ فَإِمْسَاكَ بِمَعْرُوفٍ أَوْ تَسْرِيحٌ بِإِخْلَافٍ (سورة البقرة ٢٢٩)

A divorce is only permissible twice; after that, the parties should either hold together on equitable terms, or separate with kindness. (Holy Qur'an Chapter 2- al-Baqarah: 229)

Appendix G

Islamic divorce certificate (*khulk*). (NIDC reference material)

AHLUSSUNNA WAL JAMA'A

National Headquarters

المقر الرئيسي لأهل السنة و الجماعة

This document has been issued without any alteration or erasure.

Any alteration or erasure therefore renders it invalid.

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No: MR/189/2020 THIS IS A (ONE) PAGE DOCUMENT page 1of 1

CERTIFICATE OF DISSOLUTION OF MARRIAGE **BETWEEN MR. MAN AND MADAM WOMAN**

This is to inform anyone concerned that the marriage between the above has been dissolved.

The dissolution was at the request of the ex-wife (MADAM WOMAN) on the following grounds:

1. The ex-wife ~~XXXXXXXXXX~~ complained that she was no longer interested in the marriage. See attached for explanation.

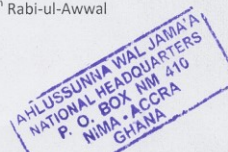
Based on the sharia (Islamic law) the ex-wife (MADAM WOMAN) was put on 'idda' (waiting period) for a period of three (3) months effective from 16th July, 2020 to 16th October, 2020.

The marriage between MR. MAN and MADAM WOMAN has therefore been dissolved as stipulated by the sharia (Islamic law) effective from 16th October, 2020.

(Sheikh Umar Ibrahim Imam)

NATIONAL IMAM

Issued on this Thursday 22nd October, 2020 corresponding to 5th Rabi-ul-Awwal 1442AH.



الطلاق مرتان فإمساكاً بمغزوف أو تنزيح بإخسار (سورة البقرة ٢٢٩)

A divorce is only permissible twice; after that, the parties should either hold together on equitable terms, or separate with kindness. (Holy Qur'an Chapter 2- al-Baqarah: 229)