




Toxic Relationship as a Reason for Divorce Analysis of Judges' Decisions in the Religious Court of Jember from the Perspective of Islamic Law

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| ARTICLE INFO | ABSTRACT |
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| <p><i>Keywords:</i> Toxic Relationship, Grounds for Divorce, Judge's Decision, Islamic Law</p> <p><i>Received :</i> 29, March <i>Revised :</i> 15, April <i>Accepted:</i> 18, May</p> <p>©2024 Agustin, Busriyanti, Sa'adah: This is an open-access article distributed under the terms of the Creative Commons Attribution 4.0 International.</p>  | <p>Toxic relationship is an unhealthy <i>relationship</i> or toxic relationship and arguably a small problem that if it continues will result in divorce and has an uncomfortable factor between one party, as evidenced in the decision in the Jember Religious Court the subject matter in a case begins with a <i>Toxic Relationship</i>, indeed in the term of the judge's decision does not use the word <i>Toxic Relationship</i>, but if explained in detail the things that Toxic means are in accordance with the characteristics in the subject matter. researchers have a focus of study including what factors influence Toxic Relationship, the judge's consideration in deciding the case and the perspective of Islamic law regarding divorce due to <i>Toxic Relationship</i>. The With normative research that focuses on laws and judge decisions and type of research used by researchers is <i>Content Analysis</i> (Content Analysis) and the method of collecting data on the law in the form of marriage laws, KHI, legal journals and judges' decisions. Then strengthened with the perspective of Islamic law as an analysis knife in <i>Toxic Relationship</i>. The conclusion in a toxic relationship will be fatal if it is not supported by the family and based on strong faith, especially to the husband who is basically the head of the household.</p> |

INTRODUCTION

Human beings are creatures that Allah has honored more than most of His creatures, as affirmed by Allah in his word:

"And indeed We have honored the sons of Adam, We have taken them on the land and on the sea, We have given them sustenance from good things and We have favored them with a perfect surplus over most of the creatures We have created."

Therefore, human behavior and lifestyle should be more respectable than most other creatures. Among the things that distinguish humans from other creatures is the existence of marriage in framing the relationship between two different types. Through the frame of marriage, it is expected to form a family with a positive life. Toxic relationships, one of the common characteristics is manipulative, always seeing the negative side, selfishness, excessive criticism, lack of empathy, often avoiding responsibility. If in a friendship relationship, this Toxic relationship can still be limited, it is different if this Toxic relationship occurs in a household relationship, surviving is very painful, especially if you already have children, if you continue it will also hurt yourself. In realizing the benefits in the family, estiar, individuals, the family is obliged to carry out their respective rights and obligations. In the Islamic dimension, al-Sxatibi states that Allah stipulates the provisions of the sxesist provisions with the aim of maintaining the five elements of the humanek Kelmi maintaining religion, maintaining the soul, maintaining the mind, maintaining offspring and maintaining berta (Lubis, et al, 2018) With the maintenance of the five unaux will make the situation in the family better. This is as stated in Q.5. ar-Ruum avat 21:

وَمِنْ آيَاتِهِ أَنْ خَلَقَ لَكُمْ مِنْ أَنْفُسِكُمْ أَزْوَاجًا لِتَسْكُنُوا إِلَيْهَا وَجَعَلَ بَيْنَكُمْ مَوَدَّةً وَرَحْمَةً إِنَّ فِي ذَلِكَ لَآيَاتٍ لِقَوْمٍ يَتَفَكَّرُونَ

Which means: "Among His signs (of greatness) is that. He created partners for you from your own kind, so that you may feel at ease with them. He created in you love and affection. Surely in that are signs (of Allah's greatness) for those who are thoughtful."

In essence, this toxic relationship can be overcome, it can be supported from family, mental support from friends and even the level of patience that must be extra in order to build a harmonious family. Because every human being has a good heart, it could be that later with patience will change the arrogant nature. In Islamic law there are several things between a wife or husband that can be divorced. But in this Toxic behavior there is some debate so that this Toxic relationship is actually not a big thing as a reason for divorce. Compilation of Islamic Law (KHI) point F which reads "Between husband and wife there are continuous disputes and quarrels and there is no hope that they will live in harmony again in the household". (Abdurrahman, 1992). In addressing this there are several differences between KHI and the judge's decision, one of which is Decision number 101/Pdt.g/2024/PA.Jr. which was

granted only because the parents interfere too much with their child's household relationship. Is this included in the *Toxic Relationship* category.

LITERATURE REVIEW

During this step, the author conducts a process of understanding previous research that has a relationship with this research. With the aim of obtaining better results. The literature reviews that have similarities with this research are:

1. Bagus Ramadi. (2019). Thesis: "Analysis of Divorce Decisions on the Grounds of Family Disharmony (Study of Decisions of the Medan Religious Court in 2017 from Psychological, Sociological and Economic Perspectives)". This research focuses on the factors causing family disharmony, the basis for considering the judge's decision in divorce. With descriptive-analytical qualitative research, and the data source used is the 2017 Medan Religious Court decision on divorce. So some of the results of his research show that divorce caused by family disharmony is influenced by three factors, namely psychological, sociological, and social factors. three factors, namely psychological, sociological and economic factors, but these three factors are not taken into consideration by judges in deciding divorce cases. This is based on the jurisprudence of the Supreme Court No. 38K/AG/1990, No. 534/K/Pdt/1996, and No. 285/K/AG/2000 which explains that judges do not need to see what and who triggered the dispute but what needs to be seen is whether the marriage can still be reconciled again or not.
2. Steven Liong, et al (2023). Journal: "Elusive Justice: Analyzing the Disparity in Judges' Decisions in Domestic Violence Cases". The research intends to analyze the basis for judges' considerations in cases of psychological violence in the household and examine the causes of disparity in judges' decisions. The method used is normative juridical research. The results show that the judge's consideration in cases of psychological violence is based on three factors, namely juridical, sociological and philosophical ideal considerations. So that there are many differences in decisions. This research has implications for the need to establish clear guidelines for judges in handling cases of domestic psychological violence.
3. Daniel Yose Febrian Sianipar & Faizah Bafadha (2023). Journal: "Analysis of the Decision of the Jember Religious Court Case Number: 465/Pdt.G/2021/PA.Jr.". This research focuses on knowing and analyzing the basis for the judge's consideration in decision number: 465/Pdt.G/2021/PA. Through the normative method, and using a statutory approach, conceptual approach, and case approach. Then analyzed using qualitative methods. The results of the research are that the decision of the Jember Religious Court Number 465/Pdt.G/2021/PA.Jr. with the legal basis of Article 19 letters (e) and (f) PP Number 9 of 1975 Jo. Article 116 letters (e) and (f). On the grounds of continuous disputes and quarrels, namely; Article 19 Letter (f) PP Number 9 of 1975 Jo. Article 116 Letter (e) of the Compilation of Islamic Law is only based on the testimony of the plaintiff's witness

without any other supporting evidence such as a psychiatric diagnosis letter or a mental hospital certificate. This reason can be used because during the trial the Defendant abandoned his right to reject the Plaintiff's arguments so that the case was decided by verdict.

METHODOLOGY

This research is normative research that focuses on what is contained in the law and judges' decisions, this research uses a *Content Analysis* approach and is sourced from primary data, namely Judge Decisions, journals and books that refer to primary data. Because this type of research is library research, the data collection technique is by reading, studying, understanding and analyzing various books and other written sources, and also through documentation in the form of books, newspaper magazines and references or blocks (Prastowo, 2016). especially with issues related to the discussion of the author. So as to test the validity of the data in the study, the authors also use triangulation techniques. This data validity checking technique utilizes something else in comparing the results of interviews with the object of research (Ikbar, 2012). Triangulation in testing credibility is defined as checking data from various sources in various ways and various times. This study uses source triangulation which tests the credibility of the data by checking the data obtained through different sources with the same technique and described in accordance with the data obtained.

RESEARCH RESULT AND DISCUSSION

Toxic Relationship

Toxic comes from English which means poison, while Relationship means relationship, so it can be interpreted that Toxic Relationship is a toxic relationship. It's no secret that we hear the term *Toxic Relationship* which can be interpreted as a toxic relationship, which is a relationship that makes one party or even both of them feel unloved, unsupported, and always humiliated either in emotional or physical form (Savitri, 2021). *Toxic relationships* are not just about infidelity, but unhealthy relationships, lack of care in a combined home date is very triggering for divorce. Other characteristics in a *toxic relationship include a* condescending attitude, lack of openness between partners, selfishness and resulting in one party feeling unappreciated Efendy.

The existence of a Toxic relationship results in the cracking of the household, even though it is sometimes very small, which starts from the emotions of one party and results in greater anger so that there will be a fight. This is due to a lack of understanding of a family that should nurture and love instead the opposite happens. Whereas in family life a good relationship is a relationship that tends to respect each other and it is done in both directions. Toxic relationships can happen to anyone, not only among young people, even adults whose marriages have reached a long age still feel an unfair relationship, aka what is famous today with the term Toxic relationship.

Reasons for Divorce

Divorce in Fiqh terms is called *Talak* or *furqoh*. *Talak* comes from the word "Ithlaq" which means to release or leave, in religious terms *talak* means to release the bonds of marriage or the dissolution of marital relations (Sabiq, 1990). So it can be concluded that divorce is the breakup of the relationship between husband and wife or the separation of marital ties between husband and wife. It can be said to be a legal event in the form of a breakup of marriage.

a. Definition of Divorce According to the Law

Divorce according to article 38 No. 1 As for divorce according to positive law in Law No. 1 of 1974, it is described in Government Regulation No. 9, namely divorce in which a divorce lawsuit is filed by and on the initiative of the husband or wife to the district court, which is considered to have occurred with all legal consequences as of the time of registration in the registration list by the printing staff at the civil registry office (Syafudin, 2014).

b. Legal Basis for Divorce

The basic ruling on divorce is *Makruh*, but it is subject to the circumstances and reality of the situation and can change to *Wajib*, *Sunnah*, *Mubah*, *Haram* (Syafudin, 2014).

- 1) It is *obligatory* if the husband has divorced his wife and sworn that he will not have sexual intercourse with her.
- 2) It is said to be *Sunnah* when the household is no longer harmonious, for example the occurrence of domestic violence, if it is maintained to bring *mudlorot* then it is better to separate (divorce).
- 3) It is said that it is permissible to divorce for certain reasons as long as it does not harm the other party.
- 4) It is *forbidden* to file for divorce without any reason.

This is confirmed by the Word of Allah in Q.S Al Baqoroh verse 229: "Two (revocable) divorces, after which there may be reconciliation in a fair manner or divorce in a good way. it is not lawful for you to take back anything of what you have given them, except when both fear that they will not be able to keep the laws of Allah. if you fear that they will not be able to keep the laws of Allah, then there is no sin on either of them concerning the payment made by the wife to redeem herself."

The verse explains that divorce can still be reconciled by the husband twice, if the husband has divorced his wife more than three times then it is forbidden for him to have sex unless the wife is married to someone else and divorced properly. Only then is it permissible to return to the first husband. It is also strengthened by the discussion of divorce with the Hadith of Rosulullah SAW which is sourced from Ibn umar r.a He said that Rosulullah SAW said "*the halal act that is most disliked by Allah is Talak*"

c. Reasons in Divorce

Even though divorce or divorce is permitted, there are several factors or reasons for it to be carried out in accordance with the law and Islamic norms. Among them, according to the Marriage Law No. 9 of 1974, in order to divorce, there must be sufficient reason that the husband and wife will not live together as husband and wife. These reasons are (Nurnila, 2013).

- 1) One of the parties is an adulterer, or an incurable gambler.
- 2) One of the parties left for 2 years without any news.
- 3) One of the parties received a 5-year prison sentence.
- 4) One party commits cruelty (domestic violence)
- 5) One of the parties is physically disabled so that he or she cannot fulfill the obligations of husband and wife.

There is constant strife and quarrel between husband and wife. (in this case the quarrel in question is not a trivial quarrel, but there are certain conditions, for example one of the parties does not carry out the commands of Allah or tells the partner to do something Fasik).

Judge's Legal Consideration

a) Judge's legal consideration (ratio decidendi)

In Indonesia, the principle of freedom of judges in deciding a case is entirely judicial power (*Ratio Decidendi*) which includes the power of the state. For judges in formulating a case is *Legal reasoning* carried out by a judge in deciding a case as fairly as possible. Judges are State officials who are authorized to exercise power, as regulated in the Judges Law in article 1 numbers 5, 6, 7 and 9 of the judicial power law. Which reads:

- Article 1 Number 5:
Judges are judges of the Supreme Court and judges of the general courts, religious courts, military courts, state administrative courts, and judges of special courts within those courts.
- Article 1 numbers 6 and 7
(6) Supreme Court Judges are judges of the Supreme Court. (7) Constitutional Judge means a judge of the Constitutional Court.
- Article 1 point 9
Ad hoc judges are temporary judges who have expertise and experience in certain fields to examine, hear and decide a case whose appointment is stipulated in the law.

The freedom of judges contextually has 3 essences in exercising judicial power, namely (Rifai, 2011).

- 1) Judges are subject only to law and justice
- 2) No one can influence the judge if the verdict has already been decided by the judge.
- 3) There is no consequence to the individual judge in carrying out judicial duties and functions.

Based on the Judicial Power Act Article 53 is also evidence that the duties of judges have been mentioned in the law which contains:

- (1) In examining and deciding cases, judges are responsible for the decisions and judgments they make.
- (2) The stipulation and decision as referred to in paragraph (1) shall set out the judge's legal reasoning which shall be based on proper and correct reasons and legal basis.

It is indeed a noble job for a judge who is truly honest and in accordance with Islamic rules based on independence, professionalism that does not deviate from the truth, this is clearly reinforced in the Qur'an Q.S Annisa 'verse 135. "O you who have believed, be ye men of justice, witnesses for Allah's sake, even if it be against yourselves, or your parents and your relatives. if he[361] be rich or poor, Allah knows better what is in his best interest. And if you twist your words or are reluctant to bear witness, then surely Allah is aware of all that you do."

b) Legal considerations of judges according to *islamic law*

Speaking of law in the view of Islam, it is clear that the principle of judge consideration is about Religious Court judges or Mujtahids who decide a problem. Wahbah Zuhaili has the *istihad* method divided into 3 parts, namely:

1) *Ijtihad Istilahi*

The Istiṣlaahi method is a method of ruling with a benefit approach (Bakr, 2010). This method is used in cases where there is no explicit ruling and evidence in the Qur'an and Hadith, and there is no *text* on the issue that can be compared to it. So in such cases, the *Istiṣlaahi* method is applied by examining the benefits caused by the problem or case (Bakhtiar, 2015). Examples are contemporary issues such as organ transplants and IVF (Fertilisasi in vitro).

If there are several contradictory arguments that indicate different legal provisions (*Ta'aarudl al-Adillah*) then the *Tarjih* Council resolves them in the following order:

(a) *Al-Jam'u wa at-taufiq*. namely the attitude of accepting all the arguments that appear to be contradictory. as for the implementation then given the freedom to choose.

(b) *At-Tarjih*. It means finding, selecting and practicing the stronger evidence and abandoning the weaker evidence.

(c) *An-Naskh*. It means choosing the evidence that comes later and practicing it.

(d) *At-Tawaqquf*. That is being neutral from the three attitudes above until it is clear to him the ruling on the issue being studied (Ja'far, 2006).

2) Ta'lili Ijtihad

Ta'lili method is a method of inferring the law by using a reasoning approach (Bakr, 2010). In practice, this method is like the *qiyas* method in the term *ushul fiqh*, which is to explore the *'Illah* (as-Sulami, 2010) of a case that has legal information in the Qur'an and hadith and then combine the law with a case that is not found in the Qur'an or hadith because of the similarity of *'Illah* (Bakhtiar, 2015). For example, hitting parents, for which there is no explicit evidence in either the Qur'an or Hadith, but with the *Ta'lili* method, the law can be concluded, namely by analogizing hitting parents with the word "akh" which is prohibited in the word of Allah *Subhaanahu Wata'ala*:

"So do not say to them the word "ah" and do not yell at them, but speak to them with kindness." (QS. al-Israa' (17): 23)

The Illah of the prohibition of saying "ah" to one's parents is that it hurts one's parents, so anything that hurts one's parents is forbidden, whether in the form of words or actions.

3) Ijtihad Bayaani

Bayaani method is a method that is done with a linguistic approach (Bakr, 2010). In this method, an attempt is made to determine the law by examining the linguistic side. The focus of this method is more focused on extracting the meaning of a text: when an expression is interpreted in *majaz*, how to determine the exact meaning of *musytarak* (ambiguous) *lafaz*, which *nashas* are generally applicable and which are specifically applicable, how to determine the command as an obligation and how to determine it as something *sunnah*, as well as about the prohibition when it is said to be forbidden and when it is punished as *makruh* and so on (Bakhtiar, 2015).

This method leads to the legal conclusion drawn from the text. An example of this is the issue of *'Iddah*, in the Qur'an a wife who is divorced by her husband who is not pregnant and has had sexual intercourse, the *Iddah* period is mentioned with the expression *قُرُوءَ ثَلَاثَةٍ*, namely in the word of Allah:

"Wives who are divorced by their husbands should wait for three *quru'* (QS. al-Baqarah (2): 228). In this version, it is mentioned that the *Iddah* period is three times *quru'*, but the phrase three times *quru'* is an ambiguous sentence, which can mean three menstrual periods and can also mean three times a period of chastity. So the *Bayaani* Method examines it by understanding the clues/*Qarinah* that exist or juxtaposing it with other evidence.

c) Judge's decision in *toxic relationship* divorce case

As has been described in detail by the author, that *toxic relationship* is an unhealthy relationship, a relationship that is initially trivial and can be handled

in an amicable way, but the number of divorce proceedings in the Jember Religious Court that sit the case starts from a toxic relationship, indeed in the sitting of the case in the decision in PA Jember does not include the term toxic relationship, but for its characteristics the case already includes a toxic relationship. To make it easier for readers and understand the purpose of the author, the author will make a table to make it easier for readers.

Table 1. Case

| Case Number | Sitting of the Case | Judges' Reasons for Deciding |
|------------------------|---|--|
| 375/Pdt.G/2024/PA.Jr. | It all started with a wife who argued and disrespected her husband. | Judgment Withdrawn after the judge advised the applicant and respondent. |
| 4119/Pdt.G/2023/PA.Jr. | The quarrels that occurred over and over again. | The verdict is granted with legal considerations |
| 36/Pdt.G/2024/PA.Jr. | The respondent often went out at night and eventually argued with the plaintiff. | Granting the plaintiff's motion by way of a verdict |
| 317/Pdt.G/2024/PA.Jr. | The plaintiff was matched up with the plaintiff, which led to arguments and eventually led to other problems such as domestic violence. | The verdict is granted with legal considerations |
| 101 /Pdt.G/2024/PA.Jr. | Disputes caused by parents interfering too much in their children's domestic relationships. | Applicant's request is not accepted |

From some of these verdicts, it is one of the many judge's decisions that sit the case starting from a toxic relationship, in 2023 there were 8,068 divorce cases, while in 2024 from January-March 2005 cases have been recorded (putusan3.mahkamahagung.go.id. 2024).

1. Divorce from an Islamic Law Perspective

a) Divorce According to KHI

In the compilation of Islamic law there are several factors that influence divorce in the family, this is stated in article 116 which has 8 points of reasons for divorce. Among them are:

- 1) One of the parties or spouses commits adultery or becomes a drunkard, addict, gambler and so on that is difficult to cure.
- 2) One party leaves the other party for 2 consecutive years without the other party's permission and without valid reasons or for other reasons beyond his/her control.
- 3) One of the parties or spouses receives a prison sentence of 5 years or a more severe sentence after the marriage has taken place.
- 4) One party or spouse commits cruelty or serious abuse that endangers the other party.
- 5) One of the parties or spouses suffers a serious disability or illness that prevents them from fulfilling their duties as husband or wife.
- 6) The husband and wife have continuous disputes and quarrels and there is no hope that they will live in harmony again.
- 7) The husband violated the taklik talak.

In point 7, which reads "There are continuous disputes and quarrels between husband and wife and there is no hope that they will live in harmony again in the household." This is actually enough to strengthen the judge in deciding a Toxic case. Only when it has not been determined what kind of quarrels and disputes are referred to in the criteria that can be divorced in Islamic law. Grounds on which it is permissible to seek divorce according to Islamic law. Rosulullah SAW said "anyone who asks to be divorced by her husband without a valid reason, then it is forbidden for her to smell the fragrance of heaven" (HR Ahmad). So in that case there are several reasons that are allowed in Islam for divorce, including:

- 1) Does not receive maintenance from husband
The husband is obliged to provide for a wife who has married him. Except in cases where the husband is lacking in finances, a wife may help as reasonable, but what happens in society is that many people file for divorce on the grounds of lack of maintenance.
- 2) Unable to restrain desire
If there is one party in the marriage who lacks desire, it is permissible to divorce him because of the fear of committing adultery outside the home.
- 3) Unable to fulfill obligations to spouse due to resentment
For example, if the marriage is arranged and there is incompatibility in the family, it can still be consulted, but if there

is hatred to provide for the family and the desire is no longer there, then it is permissible to divorce.

4) Husband with bad manners

Bad manners are also a reason for divorce. It's just that there are criteria in Islam that are meant by bad manners, like getting drunk, not praying, adultery and other despicable acts. Because basically good women are for good men, and vice versa. And this is stated in Q.S An-Nur Verse 26:

"The abominable women are for the abominable men, and the abominable men are for the abominable women, and the good women are for the good men, and the good men are for the good women. they (the accused) are clear of what they (the accusers) allege. for them is forgiveness and a glorious provision (paradise)."

5) Husband is abusive

This is very clear in Islam that it is allowed. Domestic violence is included in the important points that are allowed for divorce (www.detik.com, 2024).

In the explanation above, the author wants to examine the verdict of a judge whose case is related to Toxic, where the relationship is more of a relationship that should not be terminated, but if you look at the subject matter of the case in judge's decision No. IX:

Table 2. Decision

| | |
|------|-------------------------------------|
| I. | Decision No. 375/Pdt.G/2024/PA.Jr. |
| II. | Decision No. 4119/Pdt.G/2023/PA.Jr. |
| III. | Decision No. 36/Pdt.G/2024/PA.Jr. |
| IV. | Decision No. 375/Pdt.G/2024/PA.Jr. |
| V. | Decision No. 101 /Pdt.G/2024/PA.Jr. |

From the verdict, there are several things that are actually trivial and the judge accepts the lawsuit. So that researchers are interested in studying or examining Toxic. Toxic relationships include 1) *Inconsistency*. People who do not have consistency include toxic relationships that have an erratic nature that makes the family not conducive. 2) *They always need your attention, that's right*, they can only think of themselves without knowing how to be kind to others. 3) *There is always drama*. Usually they create conflicts and sacrifice emotions to be unkind to others. 4) *They don't respect your boundaries*. Sometimes people like this can never respect others, do not understand that everything has limits that must be maintained, Toxic relationships like this usually and often even hurt partners without feeling guilty. These things also occur in family relationships which have the potential for divorce.

When viewed from some of the judge's decisions that sit the case is things that start from a Toxic Relationship, or an unhealthy relationship, then this is

very unnatural if it causes a big effect, namely divorce, because the impact of a divorce is greater, it must reduce the ego as long as the quarrel does not come out of the norms of Islamic norms. There are even certain criteria for husbands or wives who may be divorced, namely: 1) Never pray, 2) have bad aqidah. 3) neglect the wife by not giving maintenance. 4) Giving his responsibility to his wife. 5) Being ungodly. 6) not paying off the dowry. 7) Taking back the dowry that has been given without the wife's permission. 8) Not providing a decent place to live. 9) committing violence and degrading his wife. 10) having illicit income (mommiesdaily.com, 2024).

In the 10 points above and also in comparison with the contents of KHI point 7, Toxic relationships are not included in the criteria for the criteria allowed for divorce, it's just that in the verdict of the judge whose case was accepted because the next sitting of the case is things that are allowed for divorce, for example because Toxic relationships eventually lead to domestic violence, not giving maintenance etc. Whereas if reviewed from an Islamic perspective, the occurrence of toxic relationships is due to a lack of faith, and lack of association with believers and support from families that are not good enough to result in trivial things leading to divorce.

CONCLUSIONS

The things that cause Toxic relationships are factors such as lack of support from the family, lack of counseling in the field of households, and lack of faith in themselves, resulting in arguments without any bright spots. The judge's decision aims to resolve a case, with as fair as possible, in which the judge has conducted mediation and consideration of the judge's consideration in accordance with the law of marriage, both from KHI and the Marriage Law. The rise of Toxic relationships is actually more about prioritizing the ego of each, no one wants to give in and lead to divorce and have fatal consequences for one of the parties, especially if they already have children, then this will have an impact on the psychology of the child and cause a split between the two families.

RECOMMENDATIONS

1. This research on toxic relationships from an Islamic perspective has a positive impact and can help provide improvements in the process of determining the law of the case. For this reason, legal institutions should develop similar studies that can contribute positively and support the development of positive law on toxic behavior.
2. This research on toxic relationships from an Islamic perspective has provided positive results towards improving the quality of law. For this reason, legal institutions that have similar cases should use the same approach as previously discussed.
3. In connection with this research, we hope that later research will not only be interested in the field of divorce law and cases that occur. But more than that considering that marriage is the

beginning of these cases. So the author hopes that future researchers can contribute more in-depth understanding in dealing with toxic relationship cases with the latest and relevant materials.

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