

A Translation of a Fatwa on the Difference  
Between the Prayer of Men & Women in the  
Hanafi *madhab*

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# صَلَاةُ الْمَرْأَةِ

في ضوء الحديث النبوي والمذهب الحنفي  
من "الفتاوى الرضوية" للإمام العلامة أحمد رضا خان البريلوي

نقل معانيها إلى الإنجليزية وعلق عليها

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SUNNI PAPERS SERIES 2

## Question [Regarding Where a Woman Places Her Hands During *Qiyam*]<sup>1</sup>

What do the scholars of the Shari`ah say about the position of the Hanafi scholars that men should place their hands below the navel in prayer and women should place them on their chests? Does the ruling regarding women conform to the way of the Noble Prophet (may Allah send peace and blessings upon him)? Or is it that the jurists have agreed upon this in the school? Whatever the reason, please give your reply in light of textual proofs. May Allah reward you.

## Answer [In Light of the Noble *Sunnah* & Works of *Fiqh*]:

According to the Hanafi scholars the ruling for women is that they place their hands on their chests in prayer and there is agreement on this. A vast number of scholars (*al-jamm al-gafir*) have transmitted this in their compendiums without dispute. `Allamah Muhammad b. Muhammad b. Muhammad, better known as Ibn Ameer al-Haj al-Halabi (may Allah have mercy on him), says in his commentary on *al-Munyah*<sup>2</sup>

The third place for placing the hands: Our scholars have said that men should place their hands below their navels and women should place them on their chests.

And he further points:

An enormous number of scholars have stipulated that women should place their hands on their chests<sup>3</sup>.

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<sup>1</sup> This translation is based upon the first Fatwa in the chapter on the description of prayer from Imam Ahmad Raza Khan's *Fatawa Rizwiyyah* (6: 143-9, ed. August 1994, Raza Foundation Lahore) the most comprehensive and detailed collection of *fatawa* ever known to be written in the Hanafi school by a single *Mufti*, now published in 33 oversized volumes including indexes and footnotes. This fatwa was originally written in Persian for the questioner, Sheikh Husayn Ahmad Bakhsh Faruqi, posed the question in Persian which arrived at the Imam's office in Bareilly (India) on the 29<sup>th</sup> Rajab 1305h. The reply (fatwa) is published with the Urdu translation alongside it in the new edition of the *Fatawa*. In its translation, I have kept as close as possible to the original. I inserted additional comments to explain the text which are clearly singled out in squared brackets and included useful notes for readers at every level. The unique and excellent approach of this fatwa to the issue will not be found elsewhere, and that is a grace of Allah which he bestows upon those he wants.

<sup>2</sup> The text *Munyah al-Musalli wa Guniyah al-Mubtadi* by Imam Sadid al-Din al-Kashgari (d.705h).

<sup>3</sup> It is worthy of notice here that there are three manners in which women's placing of the hands on the chest is expressed in the Hanafi Fiqh books. The first is "placing them on the chest" (*`ala al-sadr*), the second is "on the breasts" (*`ala al-thadyayn*) and the third is "below the breasts" (*tahta al-thadyayn*), Ibn Ameer al-Haj gave the first expression and ascribed it to an enormous number of scholars, the popular reading of *al-Munyah* contains the second expression, and Haskafi's *al-Durr* and a variant in *al-Munyah*'s manuscripts, as Ibn `Abideen points in *Radd al-Muhtar*, contains the third and the latter opines that the first expression is better. Imam Ahmad Raza Khan, however, comments on this in his matchless commentary on the latter's *Radd al-Muhtar* titled *Jidd al-Mumtar* (1: 240) that the entire area beneath the throat to the lower end of the breasts is what is considered as the chest. The sunnah manner for a woman is placing her palms on both breasts so that some of the

In *al-Gunyah*<sup>4</sup>, `Allamah Ibrahim b. Muhammad b. Ibrahim al-Halabi (may Allah have mercy on him) has expressed the agreement of the jurists on this. And even if there were no hadith to stipulate this [rule for women]<sup>5</sup>, there exists no hadith to ban it. If someone disapproves this rule and claims otherwise, he must provide the evidence. This is why<sup>6</sup> [Ibn Ameer al-Haj] al-Halabi (may Allah have mercy on him) states in *al-Halba*<sup>7</sup> [his commentary on *al-Munyah*]:

The reason why we say that the woman should place her right hand on her left on her chest is because this is more concealing so it is better for her to do this, as we know that all of those acts which are permissible for the woman, she should opt for the action which has extra concealment in it, especially in the case of prayer, unless the law prevents it.<sup>8</sup> This is reason is rather obvious.

## [Evidence for the Hanafi Position from a Hadith on Women Placing their Hands on their Chests]

However I say<sup>9</sup> with the gifted ability of Allah, I will present a hadith which has a good chain (*jayyid al-isnad*) to prove this [women's placing of her hands on her chest]. Its elaboration is as follows: there are two different manners narrated from the Noble Prophet (May Allah send peace and blessings on him). One of the manners is that he placed his hands below his navel and there are several *ahadith* on this, most important of them is the one Abu Bakr ibn Abi Shaybah cites in his *Musannaf* which Wakee` narrates from Musa b.

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forearms are also covering them. The wisdom behind this specific manner, Imam Ahmad Raza says, is to conceal the size of their breasts in prayer, and Allah knows best. If she placed her hands on the upper part of the chest towards the throat, she would not be following the sunnah. That is why it would be better to use the expression "on the breasts" which is more precise and not "on the chest", contrary to what `Allamah Ibn `Abideen suggests.

<sup>4</sup> Its full name is *Gunyah al-Mustamli* and is also known as *Kabiri*. Its author died in the year 956h.

<sup>5</sup> Here Imam Ahmad Raza is indicating towards the fact that the *fuqaha* have not offered a hadith on this particular issue but he himself however provides a hadith to support this position, this being one of his original contributions towards the Hanafi *madhab*, may Allah reward him the best of rewards.

<sup>6</sup> Here Imam Ahmad Raza is presenting an example of a Hanafi *faqih* who in giving the reason for the difference of the women's placing of the hands offers no more than a logical explanation. The reader will find that *fuqaha* at this point always say "because there is more concealment for her in this manner" and no more.

<sup>7</sup> Shaykh `Abdul Fattah Abu Ghudda, in his annotation on Shaykh `Abdul Hay Lakhnouwi's *al-Ajwiba al-Fadhila* (p.197-201) offered his well researched opinion on the correct name of this text after checking originals. He firmly establishes that its name is not *Hilyat al-Muhalli* as many *fuqaha* have referred to it including Ibn `Abideen in his *Radd al-Muhtar*, instead its correct name is *Halbat al-Mujalli*. Imam Ahmad Raza also follows the general trend of the *fuqaha* and keeps to the popular name for the text hence I have made the correction.

<sup>8</sup> Ibn Ameer al-Haj, *Halbat al-Mujalli wa Bugyat al-Muhtadi* (manuscript). The author died in the year 879h.

<sup>9</sup> This is the style of Imam Ahmad Raza in his *Fatawa* when he elaborates on an issue giving his original thoughts and developing the area to a level which is unique to his research. This also indicates that the following explanation has not been offered by any of the *fuqaha* before him in such a manner. The reader will see the detailed knowledge of Imam Ahmad Raza of not only *fiqh* but of the textual hadith proofs upon which the Hanafi *madhab* is established and also his expertise in re-conciliating ostensibly contradicting hadiths.

`Umayr who narrates from `Alqama b. Wa'il b. Hujr who narrates the following hadith from his father

I saw the Messenger of Allah (may Allah send peace and blessings on him) during prayer place his right hand on the left below his navel.<sup>10</sup>

In his *Takhrij* on *al-Ikhtiyar*, the commentary of *al-Mukhtar*, Imam `Allamah Qasim b. Qutlubugha Hanafi (may Allah have mercy on him) mentions that its chain is good (*jayyid*) and all its narrators are trustworthy (*thiqa*).

The second manner [narrated from the Messenger of Allah, may Allah send peace and blessings on him] is that he placed his hands on his chest. Ibn Khuzayma cites a hadith from the same Wa'il b. Hujr in his *Sahih* who says:

I prayed with the Messenger of Allah (may Allah send peace and blessings on him) and he placed his right hand on his left on his chest.<sup>11</sup>

The dates of these narrations are unknown and both of them are established and accepted<sup>12</sup>. As a result, one of them would have to be preferred over the other<sup>13</sup>. When we observe this act of prayer<sup>14</sup>, or all acts of prayer, we find that they are all based upon veneration (*ta`zim*) [and upon humbleness (*tawadhu`*) as Imam Muhammad pointed in *Kitab al-Athar*<sup>15</sup>], and the common and generally accepted way of placing hands at times of veneration is below the navel<sup>16</sup>. This is why al-Muhaqqiq Ibn al-Humam says in *Fat'h al-Qadir*:

The issue of placing the hands during standing (*qiyam*) must be based upon the generally accustomed manner and that is placing the hands below the navel.<sup>17</sup>

Therefore the [aforementioned] narration of Ibn Abi Shybah is preferred (*rajih*) for the [rule concerning] men. As for the women<sup>18</sup>, the Shariah requires a high perfection of concealment [of her nakedness (*`awrah*)].

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<sup>10</sup> Ibn Abi Shaybah, *Musannaf*, (1: 390) Chapter on Placing the Right Hand on the Left in the Book of Prayer. Karachi: Idara al-Qur'an.

<sup>11</sup> Ibn Khuzaymah, *Sahih*, (1: 243) Chapter on Placing the Right Hand on the Left in Prayer. Beirut: al-Maktab al-Islami.

<sup>12</sup> Had the dates been known, one of the manners would have been abrogated (*mansukh*).

<sup>13</sup> When the dates of two ostensibly contradicting hadith, both established, are unknown, the Hanafi *fuqaha* search for any reason (*wajh*) that may allow them to give preference to one narration over the other. This method of conciliating such narrations is known as "Tarjih".

<sup>14</sup> Imam Ahmad Raza at this point advances to find the reason for preferring the narration on placing the hands below the navel for the men over the other.

<sup>15</sup> Muhadith-e Wasiy Ahmad Suwrati, *al-Ta`liq al-Mujalli lima fi Munyat al-Musalli*, (p.280), Lahore: Dhiya al-Qur'an Publications.

<sup>16</sup> As one would stand in front of a king. See Fakhruddin al-Zayla'i's *Tabyeen al-Haqa'iq* (1:279).

<sup>17</sup> Ibn al-Humam, *Fat'h al-Qadir*, (1:249) Chapter on the Description of Prayer. Sakkhar: Nuriya Rizwiyyah.

<sup>18</sup> Imam Ahmad Raza now continues to give the reason for preferring the narration on placing the hands on the chest for women over the other narration. The reason he offers is that there is better concealment in this manner for the woman. He derives this reason from several noble traditions and presents them to support the Hanafi position.

## [Hadith Evidences for the View that Women's Prayer is Based upon Extra-Concealment]

### [1. *Ahadith* on the Women's *Saff*]

This is why the Messenger of Allah (May Allah send peace and blessings on him) said:

The most virtuous of the rows for the men [in prayer] is the one at the front and the least is the one at the back. And the most virtuous row for the women is the one at the back and the least is the one at the front.<sup>19</sup>

This hadith is narrated in all six canonical works with the exception of [*Sahih*] *al-Bukhari*, on the authority of Abu Hurayrah. Al-Tabarani narrates it in his *al-Mu`jam al-Kabir* on the authority of Ubu Umama and Ibn `Abbas (may Allah be pleased with them all).

### [2. A Hadith on Where a Woman Should Pray in Her Home]

And he [may Allah send peace and blessings on him] said:

It is better for the woman to offer her prayer inside her home than in the courtyard. And it is even better for her to offer her prayer in the smallest room.<sup>20</sup>

Abu Dawud narrates this on the authority of Ibn Mas`ud and Hakim on the authority of Umm Salamah (may Allah be pleased with them) with a reliable chain (*sanad salih*).

### [3. A Hadith on Where a Woman Must Stand when Praying with Men]

The following is a saying of [ `Abdullah] Ibn Mas`ud:

Keep them at the back as Allah has kept them at the back.<sup>21</sup>

`Abdurrazzaq narrates this in his *Musannaf* and al-Tabarani in his *al-Mu`jam* with the same chain.

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<sup>19</sup> *Sunan Abi Dawud*, (1:99) Chapter on the Row of Women. Lahore: Aftab `Alam Press.

<sup>20</sup> *Ibid.* (1:84) Book of Prayer, Chapter on the Emphasising of Prayer.

<sup>21</sup> `Abdurrazzaq, *Musannaf*, (3:149) Chapter on Women attending Congregational Prayers. Beirut: al-Maktab al-Islami. One must bear in mind the context of the nuance of this report. Females attended the congregational prayers during the era of the Noble Prophet (upon him be peace and blessings) with the men. It was intended for both genders that any means of temptation was blocked so that they reached high levels of sincerity, experience and concentration in prayer and were not distracted by other things. This is why women prayed behind, out of the sight of men.

#### [4. A Hadith on Women's Prostration Being Different from the Men's]

Likewise, the rule [stipulated in a hadith] regarding women's prostration is that they keep their body as close as possible to the ground yet men would be in breach of the sunnah if they did this<sup>22</sup>. [This specific manner for women is expressed in the following hadith] narrated by Abu Dawud in *al-Marasil* on the authority of Yazid b. Abi Habeeb

The Messenger of Allah (may Allah be pleased with him) passed by two women who were engaged in prayer. He said to them: when you prostrate, you should make some of your body touch the ground because the woman is unlike the man in that aspect [i.e. prostration].<sup>23</sup>

[This hadith illustrates that even though the original requirement of concealment had been fulfilled yet the Noble Prophet (upon him peace and blessings) wanted women to take extra care in concealing their bodies in prayer.<sup>24</sup>]

This narration is narrated through two unbroken chains. Bayhaqi states that this chain is better than the two.

#### [5. *Ahadith* on the Manner of Women's Sitting in Prayer]

And also [with regards to the sitting position during prayer (*qa`dah*)]<sup>25</sup>, it is sunnah for women to sit on the ground (*tawarruk*) [not on their left foot as do the men but on their left buttock taking both feet out from the right side<sup>26</sup>] as Imam Abu Hanifah narrated from al-Nafi` who narrated from Ibn `Umar (may Allah be pleased with them both).

[Ibn `Umar (may Allah be pleased with him) was asked: "how did the women pray in the era of the Messenger of Allah (may Allah send peace and blessings upon him)?" To which he replied: "they initially sat cross legged (*yatarabba`na*) then they were instructed to rest on the left buttock completely contracting themselves".<sup>27</sup> Bear in mind that when the companions say "we used to do so and so" it takes the meaning of a raised (*marfu`*) hadith]

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<sup>22</sup> The manner of the women is called *Tatamun* and men keep their stomachs away from their thighs which is called *Takhwiya*. See: Wahbah al-Zuhayli's *al-Fiqh al-Islami wa Adillatuhu*, (1:894) Dar al-Fikr, Damascus.

<sup>23</sup> Abu Dawud, *al-Marasil*, (p.55) Lahore: al-Matb'ah al-`Ilmiyyah.

<sup>24</sup> Muhadith-e Wasiy Ahmad Suwrati, *al-Ta`liq al-Mujalli lima fi Munyat al-Musalli*, (p.280), Lahore: Dhiya al-Qur'an Publications.

<sup>25</sup> Imam Ahmad Raza now offers another hadith from which he derives the rule that women should ensure maximum concealment in prayer.

<sup>26</sup> This is the description given in *al-Munya*, (p. 128) Maktaba Dar al-Beirut, Damascus.

<sup>27</sup> *Jami` al-Masanid* (1: 400). `Allamah Abu al-Wafa Afghani commented on this narration in his annotation on Imam Muhammad's *Kitab al-Athaar*, "this is the most authentic narration of this chapter. It is for this reason that Imam Abu Hanifah made it the basis of his *madhab*." This narration illustrates how the female companions kept their bodies closely together attached to the ground whilst sitting in prayer, clearly for purpose of extra-concealment.

And there is a narration from Sayyiduna `Ali (may Allah ennoble his countenance) [on women's sitting position] who said:

When a woman prostrates she must lean on one side and rest on the posterior (*fal tahtafiz*).<sup>28</sup>

Al-Jawhari explains its meaning [i.e. the meaning of "ihtifaz"]:

When a woman sits or prostrates she must closely draw herself together (*tatadhaammu*).<sup>29</sup>

[There is another hadith which is weak yet due to the support of the abovementioned *ahadith* also becomes strong which is narrated by Ibn `Umar (may Allah be pleased with him) who heard the Messenger of Allah (may Allah send peace and blessing upon him) say: when a woman sits in prayer she should place one thigh over the other, and when she prostrates she should join her stomach with her thighs so that it is more concealing for her. Indeed, Allah Most High looks at her and tells the angels: Oh My angels! Bear witness that I have forgiven her. Ibn `Addi narrates this in *al-Kamil*, and al-Bayhaqi in his *Sunan* who weakens it.<sup>30</sup>

As for the narration in *Sahih al-Bukhari*<sup>31</sup> where it is mentioned that Umm Darda ("the minor", the *tabi`iyya*, wife of the companion Abu al-Darda) used to sit like men and she was well-versed (*faqihah*), it should be noted that Imam Bukhari never mentioned it to use it as a proof as Ibn Hajar `Asqalani pointed in his commentary. Also, the action of a successor alone does not form a legal proof and it could have been that she had been sitting in that manner on the basis of a valid excuse (*`udhr*). What must be remembered here is that there is a raised (*marfu`*) hadith on the issue which cannot be forsaken for the action of a *tabi`iyya*.]

## [6. *Ahadith* on Where the Woman Stands When Leading Other Women in Prayer]

And if the women want to make their own congregation for prayer<sup>32</sup>, the woman leading should stand in between the others [as there is extra concealment in this unlike the case for the men where the Imam stands at the front].

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<sup>28</sup> al-Bayhaqi, *al-Sunan al-Kubra* (2: 222). *Musannaf`Abdurrazzaq* and *Musannaf* Ibn Abi Shaybah also contain this report with their chains going back to Sayyiduna `Ali. Sayyiduna `Abdullah Ibn `Abbas made a very similar statement to that of Sayyiduna `Ali that is recorded by Ibn Abi Shaybah in his *Musannaf*.

<sup>29</sup> Al-Jawhari, *al-Sihah*, Chapter of the letter *zaa*, Section on the letter *Haa*. Beirut: Dar al-`Ilm li al-Malayeen.

<sup>30</sup> Ibn `Addi, *al-Kamil*, (2:214); al-Bayhaqi, *al-Sunan* (2:223). There are several reports of the scholars of the *Salaf* on the difference between the of men and women which one can found scattered in the *Musannaf* of Ibn Abi Shaybah (a *magnum opus* for the *fiqh* views of the early generations) and *Musannaf`Abdurrazzaq*.

<sup>31</sup> In its *Ta`liq* in the Book of *Adhan*, Chapter on the Sunna Position of Sitting.

<sup>32</sup> Imam Ahmad Raza offers another example from the noble traditions to suggest that maximum concealment is stressed in all states for the women in prayer.

Imam Muhammad [b. Hassan al-Shaybani] says in *Kitab al-Athaar*:

Abu Hanifah informed us who narrates from Hammad b. Abi Sulayman from Ibrahim al-Nakh'ai that Aisha (may Allah be pleased with her) used to lead the prayers for the women in the month of Ramadhan and would stand in between them.<sup>33</sup>

`Abdurrazzaq narrates this in his *Musannaf*, and al-Daraqutni and al-Bayhaqi in their *Sunan*. The wording of `Abdurrazzaq is as follows:

Reeta al-Hanafiyya narrates that `Aisha (may Allah be pleased with her) used to stand in between the women when she lead the obligatory prayer.<sup>34</sup>

There are narrations from Umm Salama and Ibn `Abbas (may Allah be pleased with them) also concerning this and also a raised hadith (*marfu`*) which is not like that<sup>35</sup>.

## [Conclusion]

To summarize, women have a nakedness which is to be covered and all of their actions are based upon concealment. Tirmidhi with a fair (*hasan*) chain narrates on the authority of `Abdullah b. Mas`ud from the Noble Prophet (may Allah send peace and blessings upon him) who said:

The woman is nakedness (*`awra*).<sup>36</sup>

There is no doubt that for women, placing hands on their chests entails better concealment of their body and is closer to modesty [than placing them below the navel]. And women's veneration (*ta`zim*) in prayer<sup>37</sup> cannot be obtained without the correct etiquettes (*adab*), and correct etiquettes cannot be obtained without modesty (*haya*) and modesty cannot be obtained without concealment (*hijab*). Therefore, the hadith of Ibn Khuzaymah is preferred (*rajih*) for the women and it has been established that in both cases, there are *ahadith* with good chains (*jayyid al-isnad*) and the experts of hadith have acted upon the methodology of preference (*tarjih*) between the *ahadith* in such cases. A similar example is the issue of sitting in prayer. Two manners have been narrated from the Noble Prophet (may Allah send peace and blessings upon him). Our scholars [the Hanafi *fuqaha*] have preferred the manner of keeping the right foot straight upwards, and sitting on the left for the men as this is more difficult and "better actions are those which are more

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<sup>33</sup> Muhammad al-Shaybani, *Kitab al-Athaar*, (p.44) Chapter on the Woman Leading the prayer... Karachi: Idarat al-Qur'an wa al-'Ulum al-Islamiyyah.

<sup>34</sup> `Abdurrazzaq, *Musannaf*, (3:141) Chapter on the Woman Leading the prayer, Beirut: al-Maktab al-Islami.

<sup>35</sup> Imam Ahmad Raza does not mention this hadith.

<sup>36</sup> Tirmidhi, *al-Jami`*, (1:140) Chapters on Breastfeeding. Delhi: Ameen Company.

<sup>37</sup> Imam Ahmad Raza returns to what he mentioned earlier that all actions of prayer are based upon veneration and honour showing that a woman's manner of veneration is different to that of men in prayer.



difficult”<sup>38</sup>. As for the women, the *fuqaha* prefer [the *ahadith* on] sitting with the bottom on the ground (*tawarruk*) because there is extra concealment for them in this and it is easier, and women’s prayer is based upon covering and ease.

The view of the Shafi’i scholars and those who concur on the same view is different [in regards to a woman placing her hands on her chest]<sup>39</sup>. Their view is that women should place their hands “on their stomachs” (‘ala...) as in *al-Minhaj* and *al-Mizan* and others which state that there is no hadith on this issue. In *al-Khulasa*, Imam Nawawi’s *al-Minhaj* and [Ibn Hajar ‘Asqalani’s] *Bulug al-Maram*<sup>40</sup>, the only hadith their scholars (may Allah be have mercy on them) offered to support their *madhab* is that of Ibn Khuzaymah [which is mentioned above]. This needy person [of Allah Most High- humbly referring to himself] is surprised with their usage of this hadith, for how can it be a proof for their *madhab* when there is a clear difference between placing hands “on the chest” [which is the description in the hadith] and “below the chest” (which is the ruling of the Shafi’i *madhab*)?<sup>41</sup> I have discussed this in detail elsewhere<sup>42</sup> and what I have expressed above is sufficient for someone with scrupulous thought and attention.

And Allah Almighty knows best.

### [End of Fatwa]

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<sup>38</sup> This is based upon a hadith narrated on the authority of Ibn Abbas (may Allah be pleased with him) who said: the Messenger of Allah, may Allah send peace and blessings upon him, was asked about the most virtuous of actions to which he replied: “those which are more difficult (*ahmazuha*)” i.e. require more effort. Ibn al-Athir al-Jazari mentioned it in *al-Nihaya fi Gharib al-Hadith* and al-Sakhawi in *al-Maqasid al-Hasanah*.

<sup>39</sup> The reader will here see Imam Ahmad Raza’s knowledge of other *madhabs* and their texts, and also his scholarly critique of their proof on the issue.

<sup>40</sup> *Bulug al-Maram* hadith no. 275.

<sup>41</sup> He points here that the position of the Shafi’i school is not supported by any of these two hadiths. Ibn Nujaym al-Hanafi makes a similar comment in *al-Bahr al-Ra’iq* (1: 303) regarding the Shafi’i position.

<sup>42</sup> I have searched his *Fatawa* and *Jidd al-Mumtar*, his commentary on *Radd al-Muhtar*, but have been unable to find this discussion.

## Additional Notes \*

### 1. Positioning of Women's Hands During the Opening *Takbir*

As for women lifting their hands in the beginning of prayer, it is also based upon what entails maximum concealment. This is the remaining issue which the author did not discuss that is directly based upon a hadith. Imam al-Bukhari in his book on lifting the hands narrates with a chain whose narrators are trustworthy that `Abd Rabbih b. Salman b. `Umayr said: "I saw Umm Darda (the *sahabiyya* "the senior" who is not to be confused with Umm Darda the *tabi`iyya*, "the minor") may Allah be pleased with her, lifting her hands parallel to her shoulders" [and not to her ears like the men].<sup>43</sup> There is only one hadith directly narrated from the Noble Prophet (may Allah send peace and blessings upon him) on this issue which al-Tabarani narrates in the virtues (*manaqib*) of Wa'il b. Hujr through a chain whose narrators are trustworthy except Umm Yahya who is unknown in which the Messenger of Allah (may Allah send peace and blessings upon him) says: "oh Wa'il! When you offer prayer, position your hands parallel to your ears<sup>44</sup> and the woman should position them parallel to her breasts". To combine the two narrations together, the manner in which a woman should position her hands is to let the finger tips reach her shoulders whilst the rest of the hand remains below covering her breasts<sup>45</sup>. The explicit *Qiyas* suggests that women should be no different to men in this issue as their hands are not *`awra*<sup>46</sup> yet this hadith supports the implicit *Qiyas* as there is extra concealment in this manner and that is the sunnah-requirement for them in prayer.

### 2. How many Issues do Women Differ in from Men in Prayer?

Imam `Ala'uddin al-Haskafi points in *al-Durr al-Mukhtar* that there are twenty five (25) issues pertaining to prayer in which women are different to men that he presented in his *Khaza'in al-Asrar*. He is the only known scholar to have discussed this at such length. The issues which are directly based upon Hadith evidence have all been mentioned in this fatwa and its notes. All other issues are based upon *Qiyas* that is based upon the aforementioned *ahadith*. Thanks to the great `Allamah Ibn `Abideen, the author of *Radd al-Muhtar*, we have those details explained well in his aforementioned work. Imam Fakhruddin al-Zayla'i, in *Tabyeen al-Haqa'iq* (1:307), gathered only ten (10) differences, may Allah show mercy to them all.

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<sup>43</sup> Bukhari, *Juz' Raf` al-Yadayn*, (p.12).

<sup>44</sup> Imam `Abdullah b. Mahmud al-Mawsili cites this part of the hadith in *al-Ikhtiyar Li-Ta`lil al-Mukhtar* (1: 49).

<sup>45</sup> Muhadith-e Wasiy Ahmad Suwrati, *al-Ta`liq al-Mujalli lima fi Munyat al-Musalli*, (p.278), Lahore: Dhiya al-Qur'an Publications.

<sup>46</sup> According to the narration of Hassan b. Ziyad, this was the opinion of Imam Abu Hanifah. However al-Marghinani in *al-Hidaya* and all of its commentators authenticate the narration of Muhammad b. Muqatil from the students of Imam Abu Hanifah that is a woman lifts her hands to her shoulders. See Ibn al-Humam's *Fat'h al-Qadir* (1:246) & Ibn Nujaym's *al-Bahr al-Ra'iq* (1:322).

\* I personally included these to complete the topic, making this translation more useful.

### **3. Final Word on the Legal Value of Women's Actions in Prayer**

It must be remembered that in light of the Principles of Islamic Jurisprudence (*Usul al-Fiqh*) all actions mentioned in *ahadith* which are specific to women in prayer are of *sunnah*-value and not *fardh* or *wajib*, hence the implications of missing any of those actions is well understood. This is what the great *muhaddith* Wasiy Ahmad Suwrati mentioned in *al-Ta`liq al-Mujalli* and the *faqih`Abdul Hay al-Lakhnouwi* in *al-Si`ayah*. The conditional and *fardh* concealment of a woman's nakedness, namely all of her body except hands, feet and face, is well documented in *fiqh* books.

*I ask Allah Almighty to extend the benefit of this humble effort to its readers and to record it in my annals as a preparation for the day of reckoning, and to raise the ranks of the author, the great Indian Imam and faqih Ahmad Raza Khan, who served the Hanafi madhab lifelong and explained it in light of the noble Quran and Sunnah through his brilliant understanding of them, ameen.*

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