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Strengthening Zakat Institutions through Evidence-Based Governance: A Comparative Legal Study of Indonesia, Malaysia, and Singapore

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Abstract
Zakat institutions operate within increasingly complex governance environments in which legal authority, financial accountability, social welfare, and institutional effectiveness must be reconciled. Formal regulation, transparency requirements, and digitalisation, however, do not necessarily ensure that institutional decisions are informed by reliable evidence or responsive to changing social needs. This article examines how evidence is incorporated into contemporary zakat governance and identifies institutional arrangements that enable evidence to inform legitimate, accountable, and effective decision-making. Employing normative legal research with a comparative legal approach, the study examines the governance frameworks and institutional practices of zakat administration in Indonesia, Malaysia, and Singapore. The analysis focuses on the legal allocation of authority, information and reporting mechanisms, supervisory arrangements, beneficiary-oriented decision-making, and institutional evaluation. The findings demonstrate that effective zakat governance depends not merely on formal authority or disclosure, but on the institutional capacity to transform verified information into decisions and to subject those decisions to systematic evaluation. Building on the comparative findings, this article proposes a Reflexive Evidence-Based Governance Model comprising five interconnected functions: evidence generation, institutional decision-making, implementation, outcome evaluation, and corrective learning. The model reconceptualises accountability from a primarily retrospective compliance mechanism into a continuous institutional capacity for explanation, evaluation, and correction. It further positions zakat institutions as learning legal institutions in which evidence can influence subsequent decisions while remaining within the normative boundaries of Islamic law and maqāṣid al-sharīʿah. The model offers a functional governance framework applicable across diverse contemporary Muslim jurisdictions.
Keywords:
zakat governance; zakat institutions; evidence-based governance; institutional accountability; Islamic law.

Abstrak
Lembaga zakat beroperasi dalam lingkungan tata kelola yang semakin kompleks, ketika kewenangan hukum, akuntabilitas keuangan, kesejahteraan masyarakat, dan efektivitas

kelembagaan harus berjalan secara seimbang. Regulasi formal, transparansi, dan digitalisasi belum dengan sendirinya menjamin bahwa keputusan kelembagaan mampu merespons kebutuhan masyarakat atau didasarkan pada informasi yang dapat diandalkan. Artikel ini mengkaji bagaimana informasi dan data yang tersedia dapat menjadi rujukan dalam tata kelola zakat serta pengaturan kelembagaan yang memungkinkan informasi tersebut mendukung keputusan yang sah, akuntabel, dan efektif. Dengan menggunakan penelitian hukum normatif dan pendekatan komparatif, studi ini menganalisis tata kelola zakat di Indonesia, Malaysia, dan Singapura, dengan fokus pada kewenangan hukum, mekanisme informasi dan pelaporan, pengawasan, pengambilan keputusan, serta evaluasi kelembagaan. Hasil penelitian menunjukkan bahwa efektivitas tata kelola zakat tidak cukup bergantung pada kewenangan formal, transparansi, atau ketersediaan informasi, tetapi pada kemampuan lembaga menggunakan informasi yang dapat diandalkan dalam pengambilan keputusan dan meninjaunya berdasarkan hasil yang dicapai. Berdasarkan temuan tersebut, artikel ini mengusulkan Model Tata Kelola Refleksif Berbasis Informasi yang mencakup lima fungsi: pengelolaan informasi, pengambilan keputusan, implementasi, evaluasi hasil, dan pembelajaran korektif. Model ini memandang akuntabilitas sebagai kemampuan berkelanjutan untuk menjelaskan, mengevaluasi, dan memperbaiki keputusan, sekaligus menempatkan lembaga zakat sebagai institusi hukum yang terus berkembang dengan tetap berada dalam batas-batas normatif hukum Islam dan maqāṣid al-sharīʿah. Dengan demikian, model yang ditawarkan memberikan pendekatan tata kelola yang fungsional dan dapat diterapkan dalam beragam konteks kelembagaan dan hukum di berbagai yurisdiksi Muslim kontemporer.

Kata Kunci:
tata kelola zakat; lembaga zakat; tata kelola berbasis informasi; akuntabilitas kelembagaan; hukum Islam.

Introduction

Persistent poverty, inequality, and social vulnerability continue to place pressure on systems of social protection, requiring institutions to do more than mobilise resources. They must identify needs, determine priorities, allocate resources, and demonstrate whether interventions produce meaningful outcomes. Recent international assessments show that substantial gaps in social-protection coverage and poverty reduction persist, particularly among vulnerable populations.[1] vInstitutional capacity consequently becomes a central governance concern. The effectiveness of redistributive resources depends not only on how much is available, but also on the legal and organisational arrangements through which allocation decisions are made, justified, implemented, and reviewed.

Zakat offers a particularly important setting in which to examine this institutional question. As a mandatory Islamic obligation involving the redistribution of wealth to defined categories of beneficiaries, zakat has a functional relationship with social protection while remaining legally and normatively distinct from state welfare systems. Comparative research indicates that zakat can contribute to social-protection provision, although its contribution varies according to its legal status, administrative

[1] United Nations Department of Economic and Social Affairs, *World Social Report 2024: Social Development in Times of Converging Crises: A Call for Global Action* (New York: United Nations, 2024); World Bank, "Poverty, Prosperity, and Planet Report 2024: Pathways Out of the Polycrisis" (Washington, DC, 2024); International Labour Organization, "World Social Protection Report 2024-26: Universal Social Protection for Climate Action and a Just Transition" (Geneva, 2024).

arrangements, and institutional capacity.[2] Recent scholarship similarly suggests that zakat can complement social-protection floors when institutional arrangements enable resources to be directed towards identifiable social needs.[3] Consequently, the central issue is not simply whether zakat resources are collected and distributed. More fundamentally, it concerns whether zakat institutions possess sufficient legal authority and governance capacity to translate their mandate into decisions that are justified, accountable, and responsive to changing social conditions.

Institutional capacity has consequently become a prominent concern in contemporary zakat governance. Scholarship has addressed good governance, transparency, accountability, Sharīʿah governance, organisational performance, digitalisation, and the professionalisation of zakat management. A recent meta-narrative review demonstrates the consolidation of zakat governance as an established field of inquiry across different theoretical, methodological, and national contexts.[4] Empirical studies have also associated Sharīʿah governance and supervisory structures with organisational performance, while other research has examined transparency, internal control, fraud prevention, and public accountability.[5] Collectively, these studies establish the importance of institutional governance to the credibility and effectiveness of zakat administration. Much of the literature, however, conceptualises governance through identifiable attributes (transparency, accountability, supervision, compliance, and performance) rather than through the institutional process by which information is transformed into decisions and subsequently used to reconsider institutional action.

A crucial distinction follows from this observation: information is not synonymous with evidence. Zakat institutions may hold financial reports, beneficiary databases, audit findings, performance indicators, and extensive digital records without necessarily using those materials to determine who should receive assistance, which interventions deserve priority, or whether existing programmes should be maintained, modified, or discontinued. Research on Indonesian zakat institutions has identified limitations in website-based transparency and accountability, while other studies have highlighted continuing governance and information-related deficiencies.[6] Digitalisation can expand

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2 Charlotte Bilo and Anna Carolina Machado, "The Role of Zakat in the Provision of Social Protection: A Comparison between Jordan and Sudan," *International Journal of Sociology and Social Policy* 40, no. 3–4 (2020), https://doi.org/10.1108/IJSSP-11-2018-0218.

3 Nourjelha Elhag, "Beyond Charity: Under What Conditions Can Zakat Complement Social Protection Floors?," *International Social Security Review* 79, no. 2 (2026): 69–97, https://doi.org/10.1111/issr.70031.

4 Ahmad Baehaqi, Anis Chariri, and Tri Jatmiko Wahyu Prabowo, "The Governance of Zakat Institutions: A Meta-Narrative Review," *Jurnal Reviu Akuntansi Dan Keuangan* 15, no. 2 (2025), https://doi.org/10.22219/jrak.v15i2.39656. The review analyses 23 Scopus-indexed articles and maps the development of zakat governance research across theoretical, methodological, and contextual settings.

5 Faris Shalahuddin Zakiy, Falikhatun Falikhatun, and Najim Nur Fauziah, "Sharia Governance and Organizational Performance in Zakat Management Organization: Evidence from Indonesia," *Journal of Islamic Accounting and Business Research* 16, no. 6 (2025), https://doi.org/10.1108/JIABR-06-2023-0188; Ika Sari Wahyuni-TD, Hasnah Haron, and Yudi Fernando, "The Effects of Good Governance and Fraud Prevention on Performance of the Zakat Institutions in Indonesia: A Sharīʿah Forensic Accounting Perspective," *International Journal of Islamic and Middle Eastern Finance and Management* 14, no. 4 (2021), https://doi.org/10.1108/IMEFM-03-2019-0089.

6 Muhamad Wahyudi, Sri Herianingrum, and Ririn Tri Ratnasari, "Accountability Practices Based on Zakat Institutions Website in Indonesia," *Jurnal Riset Akuntansi Dan Keuangan* 9, no. 3 (2021), https://doi.org/10.17509/jrak.v9i3.31225. The study assessed website-based accountability across 26 national-level zakat institutions in Indonesia and found substantial limitations in disclosed transparency, accountability, and responsibility.

an institution's ability to generate, store, and process information, but technological capacity alone does not determine whether information becomes a basis for institutional judgement.[7] What matters, therefore, is not merely the availability or disclosure of information, but the institutional conversion of reliable information into legally and normatively justified decisions.

The challenge is consequently legal-institutional as much as managerial. Zakat institutions exercise authority over resources whose collection and distribution are governed by legal and religious norms. Legal rules establish institutional competence and recognised categories of beneficiaries, yet they do not necessarily determine which individual beneficiaries should receive priority within those categories, nor do they prescribe the appropriate form, timing, or intensity of every intervention. Institutional actors must therefore assess the severity and duration of need, household circumstances, income insecurity, debt, educational requirements, and the likely consequences of alternative forms of assistance. Evidence can make such judgements more consistent and defensible, but it cannot replace the normative categories and legal boundaries established by Islamic law. The more fundamental question is how institutional law structures the relationship between authority, evidence, decision-making, and accountability.

A specific gap emerges from this body of scholarship. Research has established the importance of transparency, accountability, good governance, Sharīʿah governance, and institutional performance, but comparatively little attention has been paid to the institutional mechanism linking evidence generation, verification, decision-making, implementation, outcome evaluation, and subsequent correction. Recent normative scholarship has begun to extend accountability beyond financial and administrative compliance towards substantive justice and maqāṣid al-sharīʿah-oriented outcomes.[8] Yet the institutional pathway through which evidence can support such substantive accountability remains insufficiently developed. Governance frameworks may establish rules, supervisory structures, reporting requirements, and accountability principles, but these arrangements do not necessarily explain how institutions learn from the consequences of their own decisions. The unresolved issue is therefore not simply the absence of governance standards; rather, it is the lack of an explicit reflexive institutional link between evidence and corrective action.

Against this background, the article conceptualises evidence-based zakat governance as an institutional decision architecture rather than a reporting technique. Evidence becomes governance-relevant when it is generated from relevant information, verified, interpreted within legal and normative boundaries, incorporated into institutional decisions, evaluated against subsequent outcomes, and used to inform further action. Such an approach differs from a technocratic understanding of evidence-based management. Evidence does not displace Islamic legal reasoning. Instead, it

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[7] Tika Widiastuti et al., "Optimizing Zakat Governance in East Java Using Analytical Network Process (ANP): The Role of Zakat Technology (ZakaTech)," *Journal of Islamic Accounting and Business Research* 12, no. 3 (2021), https://doi.org/10.1108/JIABR-09-2020-0307.

[8] Jannus Tambunan, Purnama Hidayah Harahap, and Muhammad Danil, "Accountability of Zakat Institutions: Integrating Islamic Law and Maqāṣid Al-Sharī'ah Perspectives in Fair Governance," *As-Siyasi: Journal of Constitutional Law* 6, no. 1 (2026): 271–90, https://doi.org/10.24042/as-siyasi.v61.31173; Mohamad Nafiz Naqiuddin, Mohamad Azim, and Abdul Bari Awang, "The Maqāṣid Al-Sharīʿah in the Governance of Zakāh Institutions: A Theoretical and Applied Study," *International Journal of Fiqh and Usul Al-Fiqh Studies* 10, no. 1 (2026): 131–46, https://doi.org/10.31436/ijfus.v10i1.418. The latter study specifically addresses the practical application of maqāṣid al-sharīʿah within zakāh institutional governance.

performs an epistemic function within the normative framework of zakat, strengthening the quality, consistency, justification, and accountability of institutional judgements. This perspective also connects evidence-based governance with maqāṣid al-sharīʿah by treating justice, welfare, equitable distribution, and the protection of vulnerable groups as substantive objectives against which institutional decisions and their consequences should be assessed.[9]

Viewed through this lens, the process can be understood as reflexive governance. Conventional accountability is often retrospective: institutions demonstrate that funds were collected, recorded, audited, and distributed in accordance with established procedures. A reflexive approach extends accountability beyond procedural compliance by requiring institutions to explain what evidence informed a decision, why the intervention was legally and institutionally justified, what outcomes followed, and whether those outcomes warrant further action. Accountability thus becomes a continuing institutional capacity for explanation, evaluation, and correction, rather than a terminal reporting obligation. The proposed Reflexive Evidence-Based Governance Model translates this logic into five interconnected functions: evidence generation, institutional decision-making, implementation, outcome evaluation, and corrective learning. Zakat institutions are consequently conceptualised as learning legal institutions in which institutional experience generates evidence that can inform subsequent decisions while remaining within the normative boundaries of Islamic law.[10]

The comparative dimension of the study focuses on Indonesia, Malaysia, and Singapore, three jurisdictions that provide materially different institutional configurations for performing the common function of zakat administration. Indonesia combines national statutory coordination with regulated institutional plurality; Malaysia locates zakat administration within state-based Islamic governance; while Singapore places zakat administration within a concentrated statutory religious institution. Their institutional differences provide a useful basis for examining how legal authority, institutional responsibility, information management, supervision, and decision-making are connected under different governance architectures. Rather than treating national regulations as isolated objects of comparison, the analysis therefore examines how comparable institutional functions are organised through different legal and administrative arrangements.[11]

Three questions guide the analysis: (1) how is evidence incorporated into the governance of contemporary zakat institutions; (2) what institutional arrangements enable or constrain evidence-based decision-making; and (3) what institutional lessons can be derived from Indonesia, Malaysia, and Singapore for strengthening zakat governance? The central argument is that institutional effectiveness depends not simply on the existence of legal authority, organisational structures, or reporting mechanisms, but on the capacity to transform reliable evidence into accountable decisions and to subject those decisions to systematic evaluation and correction. The article makes two

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9 Naqiuddin, Azim, and Awang, "The Maqāṣid Al-Sharīʿah in the Governance of Zakāh Institutions: A Theoretical and Applied Study."

10 Islamic Development Bank and World Bank, *Zakat Core Principles: Compliance and Prudential Requirements for Zakat Institutions* (Jeddah: Islamic Development Bank, 2016). The Zakat Core Principles provide a governance architecture covering legal foundations, supervisory authority, risk management, good amil governance, intermediary functions, and Sharīʿah governance, but they do not themselves articulate the five-stage reflexive cycle proposed in this article.

11 Mark Van Hoecke, *Methodologies of Legal Research: Which Kind of Method for What Kind of Discipline?* (LMU Munich: Bloomsbury Academic, 2013); H. Patrick Glenn, *Legal Traditions of the World: Sustainable Diversity in Law*, 5th ed. (Oxford: Oxford University Press, 2014).

principal contributions. Conceptually, it reframes zakat governance from governance-as-compliance towards evidence-informed institutional decision-making and learning. Institutionally, it develops a reflexive governance framework connecting legal authority, evidence, distributive decision-making, accountability, outcome evaluation, and institutional correction. The broader implication for the study of Islamic legal institutions is that institutional law structures not only who has authority to decide, but also how evidence informs the exercise, review, and subsequent correction of that authority.

Methodology

This research employs normative legal research with a comparative legal approach to examine how different legal and institutional arrangements constitute the governance of zakat and shape the use of evidence in institutional decision-making. The choice of a comparative approach is not intended merely to identify similarities and differences between national regulations, but to examine how different legal arrangements perform comparable institutional functions. Comparative legal research requires the selection of legally comparable units and an explicit criterion of comparison; accordingly, the study treats zakat governance as the common institutional function and compares the legal mechanisms through which authority, collection, distribution, information, supervision, and accountability are organised across jurisdictions.[12] Indonesia, Malaysia, and Singapore are selected because each provides a distinct legal-institutional configuration for administering zakat while addressing the same fundamental function: the institutional collection and distribution of zakat. The analysis therefore proceeds at the level of legal authority, institutional competence, governance mechanisms, and decision-making processes, rather than treating national systems as isolated regulatory texts. This design also avoids a purely descriptive comparison and enables the study to assess how variations in institutional design affect the capacity to transform information into accountable governance decisions.[13]

The legal materials comprise primary, secondary, and institutional materials. Primary legal materials include legislation and subsidiary regulations governing zakat administration in Indonesia, Malaysia, and Singapore, together with authoritative institutional instruments issued by the relevant zakat authorities. Secondary legal materials consist of peer-reviewed scholarship and authoritative academic works addressing zakat governance, Islamic legal institutions, comparative law, accountability, and evidence-informed decision-making. Institutional materials, including annual reports, governance reports, official statistics, policy documents, audit-related disclosures, and programme reports, are examined as documentary evidence of how the legal mandate is operationalised within institutional practice. The materials are analysed through statutory, conceptual, and comparative approaches, with the statutory approach establishing the scope of legal authority and institutional responsibility, the conceptual approach clarifying the meaning of governance and evidence-based decision-making, and the comparative approach identifying functional convergence and institutional divergence across the three jurisdictions.[14] The analysis uses four analytical dimensions: (1) allocation of legal and institutional authority; (2) mechanisms for generating and

[12] P. Ishwara Bhat, "Comparative Method of Legal Research: Nature, Process, and Potentiality," in *Idea and Methods of Legal Research*, 2020.

[13] Mark Van Hoecke, "Methodology of Comparative Legal Research," *Recht En Methode in Onderzoek En Onderwijs*, 2016, https://doi.org/10.5553/rem/.000010.

[14] David Nelken, "Comparative Legal Research and Legal Culture: Facts, Approaches, and Values," *Annual Review of Law and Social Science*, 2016, https://doi.org/10.1146/annurev-lawsocsci-110615-084950.

managing evidence; (3) incorporation of evidence into collection, beneficiary targeting, distribution, monitoring, and evaluation; and (4) accountability mechanisms through which institutional decisions can be reviewed and justified. The comparison then moves from the formal legal framework to its institutional implications, allowing the study to identify the conditions under which evidence operates not merely as administrative information but as a basis for the exercise of institutional authority.[15] The final synthesis develops an evidence-based governance model for zakat institutions by connecting legal authority, evidence generation and verification, institutional decision-making, implementation, monitoring, and accountability, while assessing their orientation towards the substantive objectives of zakat.

Findings and Discussion

Institutional Architectures and the Governance of Zakat

The governance of zakat begins with a question of legal authority: who is legally entitled to collect, administer, distribute, supervise, and account for zakat? The answer determines more than the organisational identity of the amil. It establishes the institutional chain through which religious obligation is converted into administratively enforceable responsibilities. Indonesia, Malaysia, and Singapore adopt materially different arrangements in this respect. Indonesia establishes a nationally regulated architecture centred on BAZNAS while permitting authorised LAZ to participate in zakat management; Malaysia constitutionally places zakat within the State List, leaving its administration to state Islamic authorities; and Singapore vests the statutory administration of zakat in MUIS.[16] These arrangements demonstrate that contemporary zakat governance is institutionally constituted through law rather than emerging solely from the religious obligation itself. The central issue is consequently not whether zakat is institutionally managed, but how legal authority is distributed and how that distribution structures institutional responsibility.

Indonesia represents a model of national statutory coordination with regulated institutional plurality. Law No. 23 of 2011 establishes BAZNAS as an independent, non-structural government institution accountable to the President through the Minister and authorises it to manage zakat at the national level.[17] Its statutory functions extend beyond collection and distribution to planning, implementation, control, reporting, and accountability. At the same time, the law recognises LAZ as institutions established by the community to assist zakat management, subject to licensing and regulatory requirements.[18] The resulting architecture is therefore neither a wholly state-operated system nor an entirely autonomous civil-society model. It combines a nationally recognised authority with regulated participation by non-state institutions. This arrangement gives the Indonesian system a potentially strong basis for standardisation, national coordination, and consolidated oversight, but it also creates a structural

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15 Marieke Oderkerk, "Methods of Comparative Legal Research: How to Set Up and Carry Out a Comparative Legal Research Project," in *Uncovering European Private Law: A Student Handbook*, 2025, https://doi.org/10.11647/OBP.0448.16.

16 Republic of Indonesia, Law No. 23 of 2011, arts. 5-7; Malaysia, Federal Constitution, Ninth Schedule, State List, item 1; Singapore, Administration of Muslim Law Act 1966, s. 3(2)(d).

17 Republic of Indonesia, Law No. 23 of 2011, arts. 5-6. Article 5 establishes BAZNAS as an independent, non-structural government institution accountable to the President through the Minister, while Article 6 assigns it authority to manage zakat nationally.

18 Republic of Indonesia, Law No. 23 of 2011, art. 7(1).

governance problem: national authority must be translated into coherent practices across a heterogeneous network of BAZNAS and LAZ institutions.

The legal position of BAZNAS is particularly significant because the statutory framework assigns it functions that form an institutional sequence: planning, collection, distribution and utilisation, control, reporting, and accountability.[19] This sequence places BAZNAS not merely in the position of a fund collector but as an institutional coordinator responsible for the integrity of the management cycle. The significance is reinforced by Government Regulation No. 14 of 2014, which provides the regulatory framework for implementing Law No. 23 of 2011 and places professional and accountable zakat management within the statutory governance structure.[20] The architecture nevertheless contains an inherent tension between central coordination and institutional plurality. The presence of LAZ expands the capacity of the system to mobilise community participation and specialised services, but it simultaneously requires regulatory mechanisms capable of ensuring that different institutional actors remain compatible with common standards of legality, accountability, and reporting. Recent legal analysis of the Indonesian framework has identified precisely this tension in the relationship between BAZNAS's statutory authority and the autonomy of LAZ, indicating that institutional design remains contested at the boundary between state coordination and civil-society participation.[21]

Malaysia adopts a different constitutional allocation of authority. The Federal Constitution places "Zakat, Fitrah and Baitulmal or similar Islamic religious revenue" within the State List, together with Islamic religious institutions and related matters.[22] Consequently, zakat administration is not organised through a single federal zakat authority comparable to BAZNAS. It is administered through the respective State Islamic Religious Councils (MAIN), with state zakat agencies functioning within those state-level structures.[23] The legal consequence is substantial: institutional authority is territorially distributed rather than nationally consolidated. Each state can organise its zakat administration according to its own legal and institutional arrangements, while remaining within the constitutional allocation of Islamic affairs to the states. The architecture consequently brings decision-making closer to the communities served by the institutions, but it also produces institutional variation in administrative procedures, governance structures, reporting arrangements, and operational capacity.

The Malaysian configuration should therefore not be characterised simply as decentralisation. It is better understood as state-based institutional governance under a constitutionally differentiated allocation of Islamic authority. The State Islamic Religious Councils occupy a strategic position because they combine religious authority, policy

[19] Republic of Indonesia, Law No. 23 of 2011, art. 7(1).

[20] Republic of Indonesia, Government Regulation No. 14 of 2014 concerning the Implementation of Law No. 23 of 2011 concerning Zakat Management. The regulation provides the implementing framework for the statutory institutional architecture.

[21] Ali Rajeh R. Zaari et al., "Siyāsah Sharʿiyyah and State Governance in Zakat Management: A Case Analysis of Judicial Review on BAZNAS Authority Vis-à-Vis LAZ/BAZ Institutions," *Jurnal Indo-Islamika* 15, no. 1 (2025), https://doi.org/10.15408/jii.v15i1.47332.

[22] Malaysia, Federal Constitution, Ninth Schedule, State List, item 1. The State List expressly includes "Zakat, Fitrah and Baitulmal or similar Islamic religious revenue" within state jurisdiction.

[23] Government of Malaysia, "Zakat," official government portal. The portal identifies the State Islamic Religious Councils (MAIN) and State Zakat Centres as the institutional channels for zakat management and distribution.

oversight, and institutional supervision.[24] The organisational structure can create closer alignment between local religious administration and zakat distribution, but the fragmentation of authority also raises questions concerning consistency and institutional learning across states. A governance framework that operates effectively within one state cannot automatically be treated as a national standard. The institutional challenge is thus to preserve the constitutional autonomy of state Islamic authorities while developing sufficient commonality in accounting, oversight, data management, and governance practices to permit meaningful comparison and learning. The development of Islamic accounting standards for Baitulmal, Zakat, and Wakaf by Malaysia's Accountant General's Department illustrates the institutional response to this problem: common accounting architecture can create a degree of standardisation without eliminating the constitutional position of state authorities.[25]

Singapore presents a third institutional configuration in which legal authority is more concentrated. Section 3 of the Administration of Muslim Law Act 1966 establishes MUIS as the statutory Islamic Religious Council, while section 3(2)(d) expressly assigns it responsibility for administering the collection of zakat and fitrah and other charitable contributions for the support and promotion of the Muslim religion or the benefit of Muslims.[26] Zakat administration is therefore directly connected to a statutory institution whose wider functions include the administration of Muslim religious affairs, mosques, Islamic education, and Muslim endowments and funds.[27] The institutional consequence is a comparatively integrated governance structure in which zakat is not administered as an isolated financial activity but within a broader statutory framework for Muslim community governance. MUIS's annual reporting further consolidates institutional visibility by presenting financial performance and major community initiatives within a single reporting structure.[28]

The three configurations can therefore be distinguished according to the location, concentration, and coordination of legal authority:

Table 1. Comparative Institutional Architecture of Zakat Governance in Indonesia, Malaysia, and Singapore

Dimension	Indonesia	Malaysia	Singapore
Legal foundation	Law No. 23 of 2011 on Zakat Management	Federal Constitution, Ninth Schedule, State List	Administration of Muslim Law Act 1966

[24] Rozaidy Mahadi et al., "Corporate Governance Structure of State Islamic Religious Councils in Malaysia," *International Journal of Asian Social Science* 8, no. 7 (2018), https://doi.org/10.18488/journal.1.2018.87.388.395.

[25] Accountant General's Department of Malaysia, "Committee for Islamic Accounting Standards." The committee's mandate includes the development of Islamic accounting standards for Baitulmal, Zakat, and Wakaf.

[26] Singapore, Administration of Muslim Law Act 1966, s. 3(2)(d).

[27] Majlis Ugama Islam Singapura (MUIS), "Roles & Functions." MUIS identifies zakat administration alongside the administration of Muslim endowments, mosques, Islamic education, halal certification, and other Muslim community affairs as part of its statutory functions.

[28] MUIS, *Annual Reports*. The reports provide consolidated information on institutional achievements, financial performance, and community initiatives. The 2025 annual report is currently available through the MUIS institutional archive.

Principal legal authority	BAZNAS	State Islamic Religious Councils (MAIN)	MUIS
Institutional configuration	National coordination with regulated institutional plurality	State-based institutional administration	Centrally organised statutory administration
Position of non-state/community institutions	LAZ may assist zakat management subject to statutory requirements	State zakat agencies operate within state Islamic institutional structures	Zakat administration is vested in MUIS
Primary governance strength	National coordination and regulatory standardisation	Proximity to state-level religious and community administration	Institutional integration and consolidated authority
Principal governance challenge	Coordinating BAZNAS and LAZ within a common accountability framework	Maintaining consistency and institutional learning across states	Ensuring robust accountability within a concentrated authority structure

Source: Compiled by the authors from Republic of Indonesia, Law No. 23 of 2011 concerning Zakat Management, particularly arts. 5–7 and 17–18; Malaysia, Federal Constitution, Ninth Schedule, State List, item 1; and Singapore, Administration of Muslim Law Act 1966, ss. 3 and 68–69.

The comparison reveals that institutional architecture is not a neutral administrative variable; it determines the conditions under which governance can be exercised. Indonesia's model creates an opportunity for national standardisation but must overcome fragmentation arising from multiple institutional actors. Malaysia's state-based model creates stronger territorial proximity and permits institutional adaptation, but requires mechanisms for interoperability and cross-state learning. Singapore's concentrated model facilitates integration between legal authority, administration, reporting, and service delivery, but concentration also places greater responsibility on a single institution to maintain credible internal and external accountability. None of these arrangements is intrinsically superior. Their institutional strengths and vulnerabilities arise from the relationship between authority, organisational structure, information, oversight, and responsibility.

This comparison also changes the meaning of accountability in zakat governance. Where authority is distributed among multiple institutions, accountability depends upon clear allocation of responsibility and mechanisms that allow information to move across institutional boundaries. Where authority is concentrated, accountability depends more heavily on the quality of internal controls, independent scrutiny, public reporting, and mechanisms through which beneficiaries and zakat payers can assess institutional decisions. In Malaysia, for example, the governance structure of State Islamic Religious Councils involves council-level oversight and administrative structures that manage zakat, waqf, and baitulmal functions, making the relationship between policy authority and executive administration central to institutional accountability.[29] In Malaysia's zakat and waqf institutions, the development of Shariah audit practices has likewise demonstrated the importance of supervisory capacity in reviewing whether institutional operations conform to both organisational and Shariah requirements.[30] The issue is therefore not simply the presence of an oversight body, but whether the institutional structure gives oversight actors sufficient information and authority to evaluate decisions effectively.

The institutional comparison leads to a more specific finding. The principal difference among the three jurisdictions is not whether zakat is governed institutionally, but how the law organises the relationship between authority and institutional responsibility. Indonesia emphasises national coordination within a plural institutional field; Malaysia locates authority within state-based Islamic governance; and Singapore integrates zakat administration within a concentrated statutory religious institution. These differences matter because they determine where information is generated, who is responsible for interpreting it, how decisions can be reviewed, and where accountability ultimately resides. Institutional architecture therefore constitutes the first condition of evidence-based zakat governance: before evidence can influence a decision, the legal system must establish who has the authority to decide, who must justify the decision, and which institutional actors are responsible for reviewing its consequences. This provides the analytical bridge to the next subtheme, where the question shifts from the architecture of authority to the more specific problem of how information is transformed into institutional decisions.

From Information Disclosure to Evidence-Based Decision-Making

The institutional architecture identified above provides the authority to manage zakat, but authority alone does not determine whether that authority is exercised on a sufficiently informed basis. The critical governance problem lies in the conversion of institutional information into justified decisions. Zakat institutions routinely possess information concerning collections, beneficiaries, distribution programmes, financial resources, and organisational performance. Yet the existence of such information does not by itself constitute evidence-based governance. Evidence acquires institutional significance only when information is verified, interpreted, and incorporated into decisions concerning collection, beneficiary targeting, distribution, monitoring, and institutional correction. This distinction is particularly important because zakat administration involves the exercise of distributive authority over religiously designated resources. The relevant question is therefore not simply whether an institution reports what it has done, but whether the information it produces can explain why a particular decision was made and whether subsequent outcomes require that decision to be reconsidered.

The Indonesian experience illustrates the gap between disclosure and substantive accountability. An assessment of 26 national-level zakat institutions found that website-based accountability remained limited, with average scores of only 43 percent for transparency, 34 percent for accountability, and 27 percent for responsibility.[31] The

29 Mahadi et al., "Corporate Governance Structure of State Islamic Religious Councils in Malaysia."

30 Muhammad Iqmal Hisham Kamaruddin et al., "Exploring Shariah Audit Practices in Zakat and Waqf Institutions in Malaysia," *Journal of Islamic Accounting and Business Research* 15, no. 3 (2024), https://doi.org/10.1108/JIABR-07-2022-0190.

31 Wahyudi, Herianingrum, and Ratnasari, "Accountability Practices Based on Zakat Institutions Website in Indonesia."

finding is significant because digital disclosure had already become an available institutional mechanism, yet the presence of websites did not automatically produce comprehensive accountability. Earlier empirical work similarly identified information asymmetry and weaknesses in transparency, accountability, and fairness as governance problems within zakat administration.[32] These findings suggest that disclosure is an institutional condition of accountability, but not its endpoint. Publishing financial or programme information may reduce informational opacity, but it does not necessarily demonstrate how beneficiary priorities were established, how resources were allocated, or whether institutional interventions produced the intended welfare effects.

The distinction becomes clearer when governance is connected to institutional performance. Evidence from 33 Indonesian zakat management organisations covering 151 observations during 2017-2021 indicates that elements of sharia governance, including board and supervisory structures, are associated with organisational performance. The study further identifies transparency as important for reducing information asymmetry and enabling regulators and institutional leaders to formulate more effective policies.[33] Similarly, research on good governance and fraud prevention found that governance arrangements significantly affect zakat institutional performance.[34] These findings point towards an important institutional proposition: information has governance value when it enters a structure of supervision and decision-making. Financial statements, beneficiary databases, audit findings, and programme evaluations become meaningful not merely because they are available, but because authorised actors use them to assess institutional conduct and determine whether existing practices should continue, change, or cease.

This requirement is particularly consequential for beneficiary identification. Zakat law establishes recognised categories of mustaḥiq, but legal classification alone does not resolve the question of priority among beneficiaries within those categories. Institutional decision-makers must still determine the severity and duration of need, household composition, income insecurity, educational requirements, debt obligations, and the potential effects of different forms of assistance. Evidence can therefore strengthen the reasonableness of distributive choices without replacing the normative categories established by Islamic law. In this sense, evidence-based governance should not be understood as the technocratisation of zakat. Its function is narrower and more defensible: to improve the quality, consistency, and accountability of institutional judgments made within the normative boundaries of zakat law.

Malaysia demonstrates how this problem extends from beneficiary decisions to institutional reporting itself. The implementation of the Islamic Accounting Standards for Baitulmal, Zakat and Wakaf (PPIBZW) represents a significant institutional move towards standardised financial reporting. The Malaysian Accountant General's Department states that the standards are intended to standardise the presentation of financial reporting and accounting for assets, liabilities, revenue, and expenditure relating to Baitulmal, zakat, and wakaf institutions.[35] The standards were developed in

32 Agus Wahyu Triatmo et al., "The Inefficiency of Zakat Management in BAZNAS Sragen Indonesia," *Afkaruna: Indonesian Interdisciplinary Journal of Islamic Studies* 20, no. 2 (2020), https://doi.org/10.18196/aiijis.2020.0121.209-227.

33 Zakiy, Falikhatun, and Fauziah, "Sharia Governance and Organizational Performance in Zakat Management Organization: Evidence from Indonesia."

34 Wahyuni-TD, Haron, and Fernando, "The Effects of Good Governance and Fraud Prevention on Performance of the Zakat Institutions in Indonesia: A Sharīʿah Forensic Accounting Perspective."

35 Accountant General's Department of Malaysia, "Islamic Accounting Standards for Baitulmal, Zakat and Wakaf (PPIBZW)," 27 November 2024.

four phases and became enforceable from 1 January 2025.[36] This development is important because standardised reporting creates a common evidentiary language through which institutional performance can be documented and compared. It also demonstrates that accountability cannot depend entirely on voluntary disclosure by individual institutions. The evidentiary quality of governance partly depends upon institutional rules that determine what must be recorded, how it must be classified, and how it can subsequently be scrutinised.

The Malaysian development nevertheless reveals an important limitation. Standardisation of accounting information improves the comparability and reliability of financial reporting, but financial evidence remains only one component of zakat governance. An institution may produce compliant financial statements while possessing insufficient evidence about whether its distribution programmes reach the most vulnerable beneficiaries or generate sustainable improvements in welfare. The institutional significance of PPIBZW therefore lies not in reducing governance to accounting, but in establishing a more reliable foundation upon which broader evaluation can be constructed. The Malaysian framework demonstrates a progression from institutional reporting towards evidentiary infrastructure, but the latter must still be connected to programme monitoring, beneficiary assessment, and policy review. This distinction is essential if evidence-based governance is to mean more than technically accurate financial disclosure.

Singapore provides a useful illustration of this stronger connection between institutional information and targeted intervention. MUIS does not merely report zakat as a financial resource; its institutional reporting connects zakat assistance to identified forms of household vulnerability. Its recent year-end assistance programme, for example, allocated zakat resources to thousands of households and included support related to household financial pressures and children's educational needs.[37] The significance of such reporting lies in the relationship between identified need, resource allocation, and institutional response. A governance system becomes more evidence-oriented when it can demonstrate not only how much has been distributed but also what type of need the distribution addresses, which beneficiaries are prioritised, and how the institution evaluates the adequacy of the intervention.

Digitalisation can strengthen this process, but it should not be mistaken for evidence-based governance itself. Research on Indonesian zakat digitalisation during the COVID-19 period demonstrates that digital platforms can facilitate collection, management, and distribution, while simultaneously creating risks relating to technology, security, digital literacy, and institutional capacity.[38] The implication is important for institutional design: digital infrastructure increases the capacity to produce and process information, but it does not determine the quality of the decisions made from that information. A sophisticated digital platform may simply accelerate poorly designed administrative practices if beneficiary verification, data governance, institutional oversight, and evaluation mechanisms remain weak. Digitalisation should therefore be

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[36] Accountant General's Department of Malaysia, "Islamic Accounting Standards for Baitulmal, Zakat and Wakaf (PPIBZW)." The four phases cover financial statement presentation, assets, revenue/expenditure/liabilities, and other disclosures, with enforcement commencing on 1 January 2025.

[37] Majlis Ugama Islam Singapura (MUIS), "MUIS Disburses $4.3 Million Year-End Zakat Assistance to Support over 6,000 Households," 22 December 2025.

[38] Sri Yayu Ninglasari and Mumuh Muhammad, "Zakat Digitalization: Effectiveness of Zakat Management During Covid-19 Pandemic," *Journal of Islamic Economic Laws* 4, no. 1 (2021), https://doi.org/10.23917/jisel.v4i1.12442.

treated as an enabling infrastructure within evidence-based governance rather than as its substantive measure.

The comparison suggests that contemporary zakat governance is moving through three institutional stages: disclosure, standardisation, and decision integration. Disclosure makes institutional activity visible; standardisation improves the reliability and comparability of information; decision integration determines whether information actually influences institutional conduct. Indonesia's principal challenge lies in moving beyond uneven disclosure towards stronger integration of information with supervisory and distributive decisions. Malaysia demonstrates the importance of standardised accounting infrastructure in creating comparable institutional evidence. Singapore illustrates the potential of a more integrated statutory structure to connect information about community needs with targeted assistance. The three experiences therefore represent different institutional pathways rather than a single model of reform.

The central finding is consequently that evidence-based zakat governance should be understood as a decision architecture rather than a reporting technique. Its minimum requirements are not simply transparency and digital access, but a traceable relationship between evidence and institutional action: information must be generated from relevant sources, subjected to appropriate verification, interpreted through legally and normatively defensible criteria, used in making distributive or administrative decisions, and subsequently evaluated against observable outcomes. This also changes the meaning of institutional accountability. Accountability should not end when an institution demonstrates that funds were collected and distributed according to procedure. It should extend to the institution's capacity to explain how evidence informed the allocation, why the chosen intervention was considered appropriate, what outcomes followed, and how those outcomes affected subsequent decisions.

This finding provides the analytical basis for the institutional model developed in the next section. If legal authority establishes who may decide, and evidence-based governance determines what information should inform the decision, a fully accountable zakat institution must also possess a mechanism through which decisions are evaluated and corrected. The governance cycle therefore cannot end with distribution or reporting. It must continue through monitoring, evaluation, and the production of new evidence that can inform subsequent institutional action. The resulting model moves zakat governance from a linear administrative sequence (collection, distribution, and reporting) towards a reflexive institutional cycle in which evidence, decision, implementation, evaluation, and institutional learning are continuously connected.

From Evidence to Institutional Learning: A Reflexive Model of Zakat Governance

The comparative evidence points to a limitation in conventional approaches to zakat governance: accountability is commonly organised around compliance, disclosure, and financial control, while institutional capacity to learn from evidence receives far less attention. Zakat Core Principles already provide an important governance architecture encompassing legal foundations, supervisory authority, risk management, good amil governance, intermediary functions, and sharia governance.[39] Yet these principles do not, by themselves, establish a sufficiently explicit mechanism through which evidence generated from institutional operations is translated into revised decisions. The central

[39] Islamic Development Bank and World Bank, *Zakat Core Principles: Compliance and Prudential Requirements for Zakat Institutions*.

institutional problem is therefore not the absence of governance standards, but the absence of a reflexive link between governance evidence and institutional correction.

The evidence from Indonesia, Malaysia, and Singapore demonstrates why this link matters. Indonesia provides a relatively extensive statutory architecture, but continuing concerns over transparency, accountability, and institutional role differentiation indicate that formal authority does not automatically produce effective oversight.[40] Malaysia demonstrates the value of standardised financial information through the PPIBZW framework, which strengthens the comparability and reliability of institutional reporting.[41] Singapore illustrates a more integrated relationship between institutional administration and targeted social assistance. These arrangements should not be ranked as a hierarchy of "best practices". Their value lies in revealing different institutional capacities that can be connected into a single governance cycle: Indonesia contributes the legal and organisational architecture; Malaysia demonstrates evidentiary standardisation; and Singapore illustrates the operational connection between identified social needs and targeted intervention.

The resulting model is therefore not another list of governance principles. It proposes a reflexive governance cycle consisting of five linked functions: evidence generation, institutional decision, implementation, outcome evaluation, and corrective learning. Evidence generation establishes the factual basis for action through verified financial, beneficiary, operational, and social-impact information. Institutional decision converts that evidence into legally and normatively justified choices. Implementation produces observable institutional consequences. Evaluation tests those consequences against defined objectives. Corrective learning then feeds the results back into the next decision cycle. The institutional innovation lies in making the final stage mandatory to the logic of governance: an institution is not fully evidence-based merely because it uses evidence to decide; it becomes evidence-based when the consequences of its decisions generate new evidence that can alter subsequent decisions.

This model also clarifies the relationship between Islamic legal norms and empirical evidence. Evidence cannot redefine the legally recognised beneficiaries of zakat or replace the normative requirements of sharīʿah. Its function is to inform the institutional judgment exercised within those normative boundaries. The distinction prevents two opposite errors: reducing zakat governance to bureaucratic compliance, or treating evidence-based management as a technocratic substitute for Islamic legal reasoning. Instead, evidence performs an epistemic function within a normative legal framework: it helps institutions determine the urgency of need, assess the suitability of interventions, monitor distributive consequences, and justify institutional choices while preserving the normative authority of zakat law. This approach is consistent with the emerging argument that zakat accountability should extend beyond financial compliance towards substantive assessment of social-justice outcomes.[42]

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40 Wahyudi, Herianingrum, and Ratnasari, "Accountability Practices Based on Zakat Institutions Website in Indonesia."; see also Constitutional Court of the Republic of Indonesia, Decision No. 54/PUU-XXIII/2025, 28 August 2025, concerning the constitutional review of Law No. 23 of 2011 on Zakat Management. The Court dismissed the petition concerning Article 7(1)(b) and rejected the remaining claims, while its reasoning addressed institutional concerns surrounding the regulatory and operational position of BAZNAS.

41 Accountant General's Department of Malaysia, *Islamic Accounting Standards for Baitulmal, Zakat and Wakaf (PPIBZW)* (2024). The standards establish a structured framework for financial reporting and became enforceable from 1 January 2025.

42 Tambunan, Harahap, and Danil, "Accountability of Zakat Institutions: Integrating Islamic Law and Maqāṣid Al-Sharī'ah Perspectives in Fair Governance."

The model further changes the meaning of institutional accountability. Under a conventional compliance model, accountability is largely retrospective: an institution demonstrates that funds were collected, recorded, audited, and distributed according to established procedures. Under a reflexive model, accountability becomes prospective and corrective. Institutions must be capable of answering four connected questions: What evidence supported the decision? Why was the intervention legally and institutionally justified? What outcome followed? What changed because of that outcome? This moves accountability from a static reporting obligation towards an institutional capacity for explanation, evaluation, and correction. Research on zakat governance has similarly shown that transparency, accountability, responsibility, independence, fairness, and legal compliance are not isolated attributes but interconnected conditions of institutional effectiveness.[43]

The model has particular significance for institutional design because it creates a functional distinction between data, evidence, and institutional knowledge. Data are raw institutional observations; evidence is verified and relevant information capable of supporting a decision; institutional knowledge emerges when evaluated evidence is retained and incorporated into future rules, procedures, and resource-allocation practices. This distinction prevents digitalisation and reporting from being mistaken for governance reform. A digital database may produce large volumes of data without improving institutional judgment. Conversely, a smaller but verified body of evidence can materially improve governance if it is incorporated into supervisory review and programme redesign. Recent research on zakat institutions confirms that governance quality depends not merely on formal standards but on their consistent implementation through internal controls, supervision, reporting, and corrective mechanisms.[44]

The comparative findings therefore support the following institutional proposition:

> *Evidence-based zakat governance is strongest when evidence is institutionalised as a cycle of decision, evaluation, and correction rather than treated as a reporting output.*

This proposition constitutes the principal contribution. Existing governance frameworks largely ask whether zakat institutions possess appropriate rules, supervisory structures, reporting systems, and accountability mechanisms. The proposed model asks a different question: whether those mechanisms collectively enable the institution to learn from the consequences of its own decisions. The shift is consequential because institutional failure may persist even where formal compliance is achieved. An institution can comply with reporting standards, maintain supervisory structures, and distribute funds according to procedure while repeatedly reproducing ineffective interventions. Reflexive governance addresses precisely this problem by making institutional learning an element of accountability itself. The model can be represented as follows.

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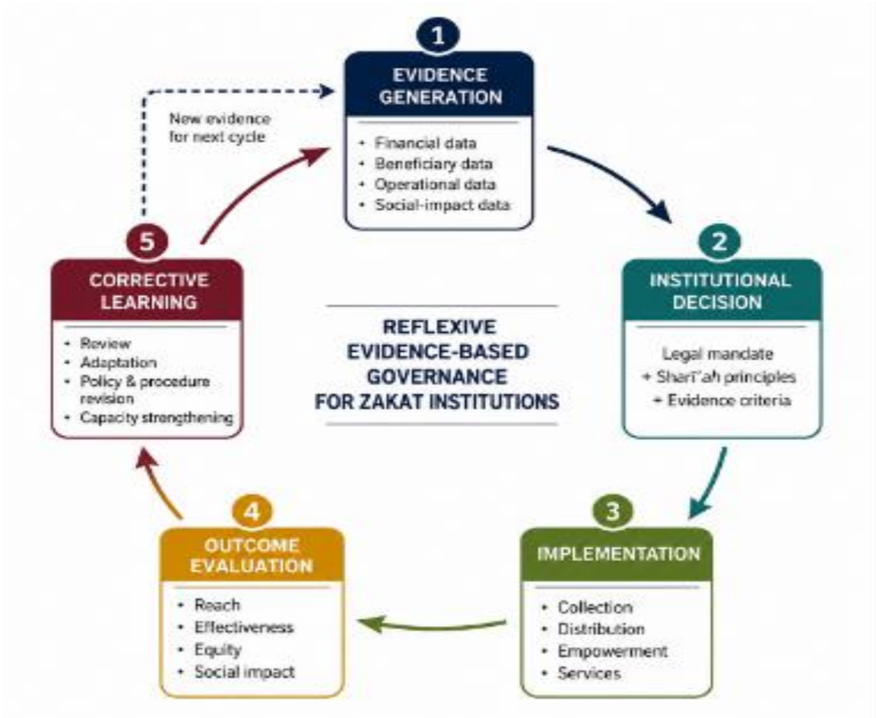
[43] Rini Elvira, "Good Amil Governance According to Zakat Core Principle: A Concept to Improve The Efficiency and Effectiveness of Zakat Management," *Indonesian Interdisciplinary Journal of Sharia Economics (IIJSE)* 6, no. 3 (2023).

[44] Syuhelmaidi Syukur, Muji Astuti Rejosumarto, and Nur Syamsudin Buchori, "The Comprehensive Examination of Zakat Governance Standards of Amil Zakat Institutions in Indonesia," *Account and Financial Management Journal* 11, no. 1 (2026): 4128–36, https://doi.org/10.47191/afmj/v11i1.15.

Figure 1. Reflexive Evidence-Based Governance Model for Zakat Institutions



Source: Developed by the authors based on the comparative analysis of zakat governance frameworks and institutional practices in Indonesia, Malaysia, and Singapore, with reference to the Zakat Core Principles and contemporary scholarship on zakat accountability and governance.

The figure should not be presented merely as a process diagram. Its analytical purpose is to show that accountability is circular rather than terminal. Reporting is located within the cycle, not at its endpoint. Likewise, supervision is not an external activity performed after institutional action; it operates across the cycle by testing evidence, decisions, implementation, and outcomes. This structure provides a more precise institutional interpretation of amanah: entrusted authority requires not only faithful administration of resources but also an organisational capacity to detect error, justify correction, and prevent repeated institutional failure.

The comparative lesson is consequently not that one jurisdiction should simply copy another. Such transplantation would ignore differences in constitutional arrangements, state–religion relations, institutional mandates, and legal authority. The more transferable lesson is functional rather than structural. Jurisdictions may organise zakat institutions differently, but each can strengthen governance by ensuring that four capacities are institutionally connected: authoritative decision-making, reliable evidence, independent or credible evaluation, and mandatory corrective response. This functional approach also explains why the Indonesian, Malaysian, and Singaporean experiences are analytically complementary rather than merely comparative.

The model therefore extends the existing understanding of zakat institutional governance in three respects. First, it moves from transparency to evidentiary reliability: information must be sufficiently verified and relevant to support institutional judgment. Second, it moves from accountability to reflexivity: accountability includes the capacity to revise decisions in response to evaluated outcomes. Third, it moves from institutional performance to institutional learning: effectiveness is not demonstrated solely by present performance but by an institution's capacity to improve its future decisions through systematically generated knowledge. This reframing positions zakat institutions not simply as administrators of religious funds, but as learning legal institutions whose legitimacy depends partly on their capacity to connect normative authority with demonstrable social outcomes.

Conclusion

The analysis presented in this article demonstrates that the fundamental challenge confronting Zakat governance cannot be strengthened simply by expanding formal regulation, increasing disclosure, or introducing digital administrative systems. The comparative analysis of Indonesia, Malaysia, and Singapore demonstrates that the central institutional challenge lies in connecting legal authority, reliable evidence, institutional decision-making, outcome evaluation, and corrective action. Formal rules determine the authority and boundaries of zakat institutions, while evidence determines whether that authority is exercised on an informed and defensible basis. The effectiveness of governance therefore depends less on the existence of individual accountability mechanisms than on their capacity to operate as an integrated institutional system.

This study proposes a Reflexive Evidence-Based Governance Model in which evidence is not treated as an administrative output but as a continuing source of institutional learning. The model connects five functions: evidence generation, institutional decision, implementation, outcome evaluation, and corrective learning. Its principal contribution is to reposition accountability from a retrospective obligation to demonstrate compliance towards a reflexive capacity to explain decisions, assess their consequences, and revise institutional practices when evidence indicates that existing approaches are ineffective. In this model, accountability is complete only when institutional experience can generate new evidence and influence subsequent decisions.

The model also preserves the normative character of zakat governance. Evidence does not replace Sharīʿah principles or determine independently who is legally entitled to zakat. Rather, it strengthens institutional judgment within the normative boundaries established by Islamic law. This distinction is crucial for preventing evidence-based governance from becoming either a purely bureaucratic exercise or a technocratic substitute for Islamic legal reasoning. The appropriate institutional objective is therefore evidence-informed implementation of normative commitments, particularly in determining beneficiary priorities, allocating resources, evaluating programmes, and improving institutional performance.

Three institutional recommendations follow. First, zakat regulators should require institutions to develop integrated evidence systems linking financial, beneficiary, operational, and social-impact information rather than treating financial reporting as the principal measure of accountability. Second, zakat institutions should establish formal outcome-review mechanisms through which distribution and empowerment programmes are periodically assessed against measurable objectives, with documented reasons for continuation, modification, or termination. Third, supervisory frameworks should recognise corrective learning as an element of institutional accountability, requiring significant findings from audits, evaluations, and beneficiary assessments to inform subsequent policies and procedures.

The broader implication is that effective zakat institutions should be understood not merely as compliant administrators of religious funds, but as learning legal institutions. Their legitimacy depends on the ability to exercise entrusted authority faithfully, produce credible evidence, evaluate the consequences of institutional action, and correct practices when evidence warrants change. The proposed model therefore offers a transferable institutional framework for contemporary Muslim jurisdictions without requiring them to adopt identical organisational structures. What can be transferred is not a particular institutional form, but the principle that zakat governance becomes genuinely evidence-based when evidence can change institutional decisions.

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Data Availability Statement

All legal materials, institutional documents, scholarly literature, and other sources analysed in this research are appropriately cited in the manuscript and reference list. No restricted or confidential dataset was used in this study.

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During the preparation of this manuscript, the author used a generative AI-assisted tool to support language refinement, structural editing, and readability. All legal arguments, interpretations, source verification, comparative analysis, and conclusions were critically reviewed and independently validated by the author. The author retains full responsibility for the content, accuracy, originality, and final version of the manuscript.

References

Accountant General's Department of Malaysia, *Islamic Accounting Standards for Baitulmal, Zakat and Wakaf (PPIBZW)* (2024).

Ahmad Baehaqi, Anis Chariri, and Tri Jatmiko Wahyu Prabowo. "The Governance of Zakat Institutions: A Meta-Narrative Review." *Jurnal Reviu Akuntansi Dan Keuangan* 15, no. 2 (2025). https://doi.org/10.22219/jrak.v15i2.39656.

Bhat, P. Ishwara. "Comparative Method of Legal Research: Nature, Process, and Potentiality." In *Idea and Methods of Legal Research*, 2020.

Bilo, Charlotte, and Anna Carolina Machado. "The Role of Zakat in the Provision of Social Protection: A Comparison between Jordan and Sudan." *International Journal of Sociology and Social Policy* 40, no. 3–4 (2020). https://doi.org/10.1108/IJSSP-11-2018-0218.

Elhag, Nourjelha. "Beyond Charity: Under What Conditions Can Zakat Complement Social Protection Floors?" *International Social Security Review* 79, no. 2 (2026): 69–97. https://doi.org/10.1111/issr.70031.

Elvira, Rini. "Good Amil Governance According to Zakat Core Principle: A Concept to Improve The Efficiency and Effectiveness of Zakat Management." *Indonesian Interdisciplinary Journal of Sharia Economics (IIJSE)* 6, no. 3 (2023).

Glenn, H. Patrick. *Legal Traditions of the World: Sustainable Diversity in Law*. 5th ed.

Oxford: Oxford University Press, 2014.

Hoecke, Mark Van. *Methodologies of Legal Research: Which Kind of Method for What Kind of Discipline?* LMU Munich: Bloomsbury Academic, 2013.

———. "Methodology of Comparative Legal Research." *Recht En Methode in Onderzoek En Onderwijs*, 2016. https://doi.org/10.5553/rem/.000010.

International Labour Organization. "World Social Protection Report 2024-26: Universal Social Protection for Climate Action and a Just Transition." Geneva, 2024.

Islamic Development Bank and World Bank. *Zakat Core Principles: Compliance and Prudential Requirements for Zakat Institutions*. Jeddah: Islamic Development Bank, 2016.

Kamaruddin, Muhammad Iqmal Hisham, Zurina Shafii, Mustafa Mohammed Hanefah, Supiah Salleh, and Nurazalia Zakaria. "Exploring Shariah Audit Practices in Zakat and Waqf Institutions in Malaysia." *Journal of Islamic Accounting and Business Research* 15, no. 3 (2024). https://doi.org/10.1108/JIABR-07-2022-0190.

Mahadi, Rozaidy, Noor Kaziemah Sariman, Raman Noordin, Rasid Mail, and Nur Shahida Ab Fatah. "Corporate Governance Structure of State Islamic Religious Councils in Malaysia." *International Journal of Asian Social Science* 8, no. 7 (2018). https://doi.org/10.18488/journal.1.2018.87.388.395.

Naqiuddin, Mohamad Nafiz, Mohamad Azim, and Abdul Bari Awang. "The Maqāṣid Al-Sharīʿah in the Governance of Zakāh Institutions: A Theoretical and Applied Study." *International Journal of Fiqh and Usul Al-Fiqh Studies* 10, no. 1 (2026): 131–46. https://doi.org/10.31436/ijfus.v10i1.418.

Nelken, David. "Comparative Legal Research and Legal Culture: Facts, Approaches, and Values." *Annual Review of Law and Social Science*, 2016. https://doi.org/10.1146/annurev-lawsocsci-110615-084950.

Ninglasari, Sri Yayu, and Mumuh Muhammad. "Zakat Digitalization: Effectiveness of Zakat Management During Covid-19 Pandemic." *Journal of Islamic Economic Laws* 4, no. 1 (2021). https://doi.org/10.23917/jisel.v4i1.12442.

Oderkerk, Marieke. "Methods of Comparative Legal Research: How to Set Up and Carry Out a Comparative Legal Research Project." In *Uncovering European Private Law: A Student Handbook*, 2025. https://doi.org/10.11647/OBP.0448.16.

Republic of Indonesia. Law No. 23 of 2011 concerning Zakat Management (2011).

Republic of Indonesia, Government Regulation No. 14 of 2014 concerning the Implementation of Law No. 23 of 2011 concerning Zakat Management.

Singapore, Administration of Muslim Law Act 1966

Syukur, Syuhelmaidi, Muji Astuti Rejosumarto, and Nur Syamsudin Buchori. "The Comprehensive Examination of Zakat Governance Standards of Amil Zakat Institutions in Indonesia." *Account and Financial Management Journal* 11, no. 1 (2026): 4128–36. https://doi.org/10.47191/afmj/v11i1.15.

Tambunan, Jannus, Purnama Hidayah Harahap, and Muhammad Danil. "Accountability of Zakat Institutions: Integrating Islamic Law and Maqāṣid Al-Sharī'ah Perspectives in Fair Governance." *As-Siyasi: Journal of Constitutional Law* 6, no. 1 (2026): 271–90. https://doi.org/10.24042/as-siyasi.v61.31173.

Triatmo, Agus Wahyu, Ravik Karsidi, Drajat Tri Kartono, and Suwarto Suwarto. "The Inefficiency of Zakat Management in BAZNAS Sragen Indonesia." *Afkaruna: Indonesian Interdisciplinary Journal of Islamic Studies* 20, no. 2 (2020). https://doi.org/10.18196/aiijis.2020.0121.209-227.

United Nations Department of Economic and Social Affairs. *World Social Report 2024: Social Development in Times of Converging Crises: A Call for Global Action*. New York:

United Nations, 2024.
Wahyudi, Muhamad, Sri Herianingrum, and Ririn Tri Ratnasari. "Accountability Practices Based on Zakat Institutions Website in Indonesia." *Jurnal Riset Akuntansi Dan Keuangan* 9, no. 3 (2021). https://doi.org/10.17509/jrak.v9i3.31225.
Wahyuni-TD, Ika Sari, Hasnah Haron, and Yudi Fernando. "The Effects of Good Governance and Fraud Prevention on Performance of the Zakat Institutions in Indonesia: A Sharīʿah Forensic Accounting Perspective." *International Journal of Islamic and Middle Eastern Finance and Management* 14, no. 4 (2021). https://doi.org/10.1108/IMEFM-03-2019-0089.
Widiastuti, Tika, Eko Fajar Cahyono, Siti Zulaikha, Imron Mawardi, and Muhammad Ubaidillah Al Mustofa. "Optimizing Zakat Governance in East Java Using Analytical Network Process (ANP): The Role of Zakat Technology (ZakaTech)." *Journal of Islamic Accounting and Business Research* 12, no. 3 (2021). https://doi.org/10.1108/JIABR-09-2020-0307.
World Bank. "Poverty, Prosperity, and Planet Report 2024: Pathways Out of the Polycrisis." Washington, DC, 2024.
Zaari, Ali Rajeh R., Elmira Hasibuan, Rifadillah Wahyu, and Muhammad R. Jassin. "Siyāsah Sharʿiyyah and State Governance in Zakat Management: A Case Analysis of Judicial Review on BAZNAS Authority Vis-à-Vis LAZ/BAZ Institutions." *Jurnal Indo-Islamika* 15, no. 1 (2025). https://doi.org/10.15408/jii.v15i1.47332.
Zakiy, Faris Shalahuddin, Falikhatun Falikhatun, and Najim Nur Fauziah. "Sharia Governance and Organizational Performance in Zakat Management Organization: Evidence from Indonesia." *Journal of Islamic Accounting and Business Research* 16, no. 6 (2025). https://doi.org/10.1108/JIABR-06-2023-0188.