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## GOVERNANCE AND MANAGEMENT OF ZAKAT AND WAQF: EVIDENCE-BASED PRACTICES FROM SOUTHEAST ASIA AND THE MIDDLE EAST – A SYSTEMATIC LITERATURE REVIEW

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**ABSTRACT:** *This study aims to analyze evidence-based practices in the governance and management of zakat and waqf in Southeast Asia and the Middle East. The research adopts a qualitative approach using a literature review and comparative analysis of selected countries with relatively advanced zakat and waqf management systems. The findings reveal that the effectiveness of zakat and waqf governance is strongly influenced by robust regulatory frameworks, institutional professionalism, transparency and accountability in fund management, and the adoption of digital technologies. Southeast Asian countries tend to excel in digital innovation and system integration, while Middle Eastern countries demonstrate strengths in regulatory support and the large-scale management of waqf assets. The study also identifies key challenges, including the lack of global standardization, limited inter-institutional coordination, and varying levels of public literacy regarding zakat and waqf. Therefore, an adaptive, transparent, and collaborative governance model is essential to enhance the effectiveness of zakat and waqf management in supporting socio-economic development within the Muslim community.*

**Keywords:** *Zakat; Waqf; Governance; Islamic Financial Management; Transparency and Accountability*

**ABSTRAK:** Penelitian ini bertujuan untuk menganalisis praktik berbasis bukti dalam tata kelola dan manajemen zakat serta wakaf di kawasan Asia Tenggara dan Timur Tengah. Penelitian ini menggunakan pendekatan kualitatif dengan metode studi literatur dan analisis komparatif terhadap beberapa negara yang memiliki sistem pengelolaan zakat dan wakaf yang relatif maju. Hasil penelitian menunjukkan bahwa efektivitas tata kelola zakat dan wakaf sangat dipengaruhi



oleh kekuatan kerangka regulasi, profesionalisme kelembagaan, transparansi dan akuntabilitas dalam pengelolaan dana, serta pemanfaatan teknologi digital. Negara-negara di Asia Tenggara cenderung unggul dalam inovasi digital dan integrasi sistem pengelolaan, sementara negara-negara di Timur Tengah menunjukkan keunggulan dalam dukungan regulasi dan skala pengelolaan aset wakaf. Penelitian ini juga mengidentifikasi sejumlah tantangan, seperti kurangnya standarisasi global, keterbatasan koordinasi antar lembaga, serta variasi tingkat literasi masyarakat terhadap zakat dan wakaf. Oleh karena itu, diperlukan model tata kelola yang adaptif, transparan, dan kolaboratif guna meningkatkan efektivitas pengelolaan zakat dan wakaf dalam mendukung pembangunan sosial dan ekonomi umat.

**Kata Kunci:** Zakat; Wakaf; Tata Kelola; Manajemen Keuangan Islam; Transparansi dan Akuntabilitas.

## INTRODUCTION

Zakat and waqf represent two fundamental pillars of Islamic social finance that have historically played a significant role in promoting social welfare, economic redistribution, and sustainable development within Muslim societies<sup>1</sup>. As compulsory almsgiving, zakat functions as a redistributive mechanism designed to alleviate poverty and support vulnerable segments of society<sup>2</sup>, whereas waqf operates as a perpetual charitable endowment that generates long-term socio-economic benefits through the provision of public goods such as education, healthcare, housing, and infrastructure<sup>3</sup>. These institutions historically constituted an integral component of socio-economic governance in Muslim civilizations, contributing to the development of public welfare systems long before the emergence of modern state-based social protection frameworks.

In contemporary times, the significance of zakat and waqf has gained renewed attention as Islamic social finance increasingly emerges as a complementary instrument for addressing global development challenges. The growing recognition of Islamic philanthropy within international development discourse is reflected in the increasing interest among policymakers<sup>4</sup>, development agencies, and scholars in exploring the potential of zakat and waqf to support poverty reduction, financial inclusion, and sustainable development<sup>5</sup>. With the

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<sup>1</sup> Ziyaad Mahomed and Irum Saba, *Sustainable Development: Exploring the Role of Islamic Social Finance in Promoting Sustainable Development and Social Welfare*, 2024.

<sup>2</sup> Mahomed and Saba, *Sustainable Development: Exploring the Role of Islamic Social Finance in Promoting Sustainable Development and Social Welfare*.

<sup>3</sup> Muhammad Ayub et al., "Waqf for Accelerating Socioeconomic Development: A Proposed Model with Focus on Pakistan," *Qualitative Research in Financial Markets* 16, no. 5 (2024): 937–61.

<sup>4</sup> Juanjo Mediavilla and Jorge Garcia-Arias, "Philanthrocapitalism as a Neoliberal (Development Agenda) Artefact: Philanthropic Discourse and Hegemony in (Financing for) International Development," *Globalizations* 16, no. 6 (2019): 857–75.

<sup>5</sup> Imad Hisham Ismael Alkhatib and Basheer Hussein Motawe Altarturi, "Integrating Zakat, Waqf, and Risk-Sharing Contracts through Fintech-Enabling Mechanisms for Sustainable Islamic



global Muslim population exceeding 1.9 billion and the estimated potential of zakat funds reaching hundreds of billions of dollars annually<sup>6</sup>, Islamic social finance is widely regarded as an underutilized resource capable of contributing significantly to inclusive economic development<sup>7</sup>.

Alongside this growing recognition, the institutional landscape of zakat and waqf has undergone substantial transformation over the past two decades. Traditionally administered through informal community networks or religious authorities, many zakat and waqf institutions have evolved into formal organizations with increasingly sophisticated governance structures and professional management systems. In several Muslim-majority countries, national zakat agencies, waqf authorities, and philanthropic foundations have been established to regulate, collect, manage, and distribute funds in a more systematic and accountable manner<sup>8</sup>.

Moreover, the integration of financial technology has further reshaped the operational dynamics of Islamic philanthropic institutions by enabling digital payment platforms, crowdfunding mechanisms<sup>9</sup>, and integrated financial reporting systems that enhance efficiency, transparency, and donor participation<sup>10</sup>.

Despite these institutional advancements, significant disparities remain in the governance and management practices of zakat and waqf institutions across countries<sup>11</sup>. Different jurisdictions adopt varying governance arrangements depending on their legal traditions, regulatory environments, and institutional capacities. For instance, some countries implement centralized governance systems in which the state plays a dominant role in regulating and managing zakat and waqf institutions, as observed in Malaysia and several Gulf Cooperation Council (GCC) countries<sup>12</sup>. In contrast, other countries rely on decentralized or hybrid governance structures that involve multiple actors, including government agencies, civil society

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Microfinance toward Financial Inclusion in Developing Economies: The Case of Palestine," *Al Qasimia University Journal of Islamic Economics* 5, no. 2 (2025): 73–114.

<sup>6</sup> Masood Ahmed, "The Impact of Zakah, Interest, Inflation, and Taxation on Muslims Living in Non-Islamic Countries," *INTERNATIONAL JOURNAL* 13, no. 11 (2024): 1648–53.

<sup>7</sup> Hussein Azeemi Abdullah Thaidi et al., "Addressing Challenges, Unleashing Potentials: Towards Achieving Impactful Islamic Social Finance," *Ulum Islamiyah* 35, no. 02 (2023): 63–85.

<sup>8</sup> Muhammad Ayub et al., "Management and Governance of Awqāf as Social Finance Institutions," *Qualitative Research in Financial Markets*, 2025.

<sup>9</sup> Nurul Aini Muhamed et al., "Shariah Governance and Financial Management Framework for Islamic Donation-Based Crowdfunding (IDCF)," *Qualitative Research in Financial Markets* 18, no. 3 (2026): 790–807.

<sup>10</sup> Muhammad Karakulah and Aishath Muneeza, "Exploring the Role of Donation-Based Crowdfunding in Islamic Social Finance," *International Journal of Islamic Economics and Finance Research* 7, no. 1 July (2024): 42–58.

<sup>11</sup> Muhammad Bilal Zafar and Hassnian Ali, "Waqf as a Socioeconomic Institution and Its Governance and Development for Welfare and Sustainability," *Discover Global Society* 4, no. 1 (2026): 58.

<sup>12</sup> Mukhlishin Mukhlishin et al., "Zakat Maal Management and Regulation Practices: Evidence from Malaysia, Turki and Indonesia," *Journal of Human Rights, Culture and Legal System* 4, no. 2 (2024): 569–92.



organizations, and private philanthropic<sup>13</sup>. These differences have important implications for institutional performance, particularly in terms of fundraising capacity, allocation efficiency, transparency, and public trust.

Empirical evidence suggests that governance quality is a critical determinant of the effectiveness and credibility of zakat and waqf institutions. Studies indicate that transparent reporting systems, strong regulatory oversight, and professional management structures significantly enhance public trust and donor participation<sup>14</sup>. Conversely, weak governance mechanisms such as inadequate accountability systems, fragmented regulatory frameworks, and limited managerial capacity can undermine the performance of Islamic philanthropic institutions and hinder the realization of their socio-economic potential<sup>15</sup>. Furthermore, the underutilization of waqf assets in many Muslim countries demonstrates the challenges associated with inefficient governance structures and the lack of strategic asset management approaches. A substantial body of literature has examined various dimensions of zakat and waqf within the broader field of Islamic social finance. Early studies primarily focused on estimating the economic potential of zakat and evaluating its role in poverty alleviation<sup>16</sup>.

Other scholars have explored the historical development and economic significance of waqf institutions, highlighting their role in financing social infrastructure and supporting public welfare systems in pre-modern Islamic societies<sup>17</sup>. More recent studies have emphasized the importance of institutional innovation and digital transformation in enhancing the efficiency and transparency of zakat and waqf management<sup>18</sup>.

In addition, emerging research has begun to explore the integration of Islamic social finance with broader development frameworks such as Maqasid al-Shariah and the Sustainable Development Goals (SDGs), emphasizing the strategic role of zakat and waqf in achieving inclusive and sustainable development<sup>19</sup>.

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<sup>13</sup> Jan-Erik Johanson and Jarmo Vakkuri, "Governance of Hybrid Networks in Organisations and Society," in *Handbook of Accounting and Public Governance* (Edward Elgar Publishing, 2024).

<sup>14</sup> Ushi Ghoorah et al., "Relationships between Financial Transparency, Trust, and Performance: An Examination of Donors' Perceptions," *Humanities and Social Sciences Communications* 12, no. 1 (2025): 1-11.

<sup>15</sup> Mediavilla and Garcia-Arias, "Philanthrocapitalism as a Neoliberal (Development Agenda) Artefact: Philanthropic Discourse and Hegemony in (Financing for) International Development."

<sup>16</sup> Zulkipli Zulkipli et al., "The Strategic Role of Zakat and Waqf in Sustainable Poverty Alleviation: A Literature Review from the Perspective of Islamic Economics," *Islamic Banking: Jurnal Pemikiran Dan Pengembangan Perbankan Syariah* 11, no. 1 (2025): 17-32.

<sup>17</sup> Minlib Dallh, "Accumulate but Distribute: Islamic Emphasis on the Establishment of Waqf (Pious Endowment)," *Religion and Development* 2, no. 1 (2023): 21-40.

<sup>18</sup> Azhana Othman et al., "Empowering Asnaf through Zakat and Digital Transformation: A Literature Review on Challenges and Strategic Directions in Malaysia," *International Journal of Research and Innovation in Social Science (IJRISS)* 9, no. 11 (2025).

<sup>19</sup> Jelang Ramadhan and Imam Khomeini Hayatullah, "Zakat and Waqf Synergies to Accelerating Sustainable Development," *Journal of Sustainable Development and Regulatory Issues (JSDERI)* 3, no. 1 (2025): 29-54.



Nevertheless, despite the growing literature, several important research gaps remain. First, most existing studies examine zakat and waqf as separate institutional mechanisms, even though both instruments operate within the broader ecosystem of Islamic social finance and often share similar governance challenges. The lack of integrated analysis limits the ability to understand how coordinated governance frameworks could enhance the overall effectiveness of Islamic philanthropic institutions.

Second, a significant portion of empirical research focuses on single-country or single-institution case studies. While these studies provide valuable insights into specific contexts, they offer limited opportunities for cross-country comparison and the identification of transferable governance practices. As a result, the literature still lacks comprehensive comparative analyses that examine governance and management practices of zakat and waqf institutions across different regions and institutional environments.

Third, although governance issues are increasingly acknowledged as important determinants of institutional effectiveness, relatively few studies systematically examine the specific governance mechanisms that shape the performance of zakat and waqf institutions. In particular, limited attention has been given to how accountability systems, transparency practices, stakeholder engagement mechanisms, and professional management structures interact to influence organizational outcomes.

Fourth, another critical gap lies in the limited integration between governance analysis and the broader developmental objectives of Islamic social finance. While zakat and waqf are widely recognized as instruments capable of contributing to the realization of Maqasid al-Shariah and the SDGs, relatively little research has explored how governance structures and managerial practices enable or constrain the ability of these institutions to achieve such strategic objectives.

Addressing these gaps is particularly urgent in the context of growing socio-economic challenges faced by many Muslim-majority countries. Persistent issues such as poverty, income inequality, unemployment, and limited access to social services continue to affect millions of people across the Muslim world. At the same time, increasing public demand for transparency and accountability in charitable organizations has placed additional pressure on zakat and waqf institutions to adopt more professional governance frameworks. Strengthening governance and management practices is therefore essential to ensure that Islamic philanthropic institutions can effectively mobilize resources and deliver meaningful socio-economic impact.

Against this backdrop, examining global practices of zakat and waqf governance and management offers a valuable opportunity to identify both convergences and divergences in institutional approaches. Comparative analysis across countries allows for the identification of governance principles, institutional innovations, and managerial strategies that contribute to effective fundraising, transparent resource management, and impactful distribution. Such insights are



particularly valuable for policymakers and practitioners seeking to reform or strengthen zakat and waqf institutions within their respective national contexts.

Therefore, this study aims to analyze governance and management practices of zakat and waqf institutions through a comparative and evidence-based perspective. By synthesizing experiences from different institutional and geographical contexts, the study seeks to identify key governance principles and managerial innovations that contribute to the effectiveness of Islamic philanthropic institutions in achieving their socio-economic objectives.

The novelty and contribution of this research lie in several aspects. First, the study provides an integrated analysis of zakat and waqf governance, moving beyond the fragmented approach commonly found in existing literature. Second, the research adopts a comparative perspective that examines governance and management practices across different institutional environments, thereby offering broader insights into the diversity of governance models in Islamic social finance.

Third, the study bridges the gap between governance analysis and the developmental objectives of Islamic social finance by exploring how institutional arrangements influence the ability of zakat and waqf institutions to contribute to Maqasid al-Shariah and the Sustainable Development Goals. Through these contributions, the study aims to advance the academic discourse on Islamic social finance governance while providing practical insights for strengthening zakat and waqf institutions as credible and impactful actors within the global social finance ecosystem.

## METHOD

This study employs a qualitative research design using a Systematic Literature Review (SLR) approach to examine governance and management practices of Zakat and Waqf institutions across different countries. The SLR method allows researchers to systematically identify, evaluate, and synthesize existing academic knowledge in order to develop a comprehensive understanding of a particular research topic. This study follows the Systematic Literature Review framework proposed by vom Brocke et al.<sup>20</sup> (2009), which consists of several stages, including literature identification, screening, eligibility assessment, and synthesis of findings<sup>21</sup>. In addition, the research scope and structure are guided by the taxonomy of literature review proposed by Cooper (1988) to ensure clarity in research objectives, theoretical orientation, and methodological rigor<sup>22</sup>. The literature search was conducted using several major academic databases, including Scopus, Web of Science (WoS), and Google Scholar, to ensure comprehensive coverage of peer-reviewed scholarly publications and institutional reports.

<sup>20</sup> Jan vom Brocke et al., "IT-Enabled Organizational Transformation: A Structured Literature Review," *Business Process Management Journal* 27, no. 1 (2021): 204–29.

<sup>21</sup> Joshua D. Harris et al., "How to Write a Systematic Review," *The American Journal of Sports Medicine* 42, no. 11 (2014): 2761–68.

<sup>22</sup> Mathieu Templier and Guy Paré, "A Framework for Guiding and Evaluating Literature Reviews," *Communications of the Association for Information Systems* 37, no. 1 (2015): 6.



Table 1. Distribution of Publications by Academic Database

Database	Initial Articles Identified	Articles Selected After Screening	Percentage
Scopus	55	18	37.5%
Web of Science	40	12	25%
Google Scholar	55	18	37.5%
<b>Total</b>	<b>150</b>	<b>48</b>	<b>100%</b>

Keywords used in the search process included combinations of terms such as “zakat governance,” “waqf management,” “Islamic social finance governance,” “zakat institution management,” and “waqf institutional governance.” The search focused on publications from 2010 to 2024 in order to capture recent developments in the governance and management of Islamic philanthropic institutions.

Table 2. Distribution of Selected Publications by Year (2010–2024)

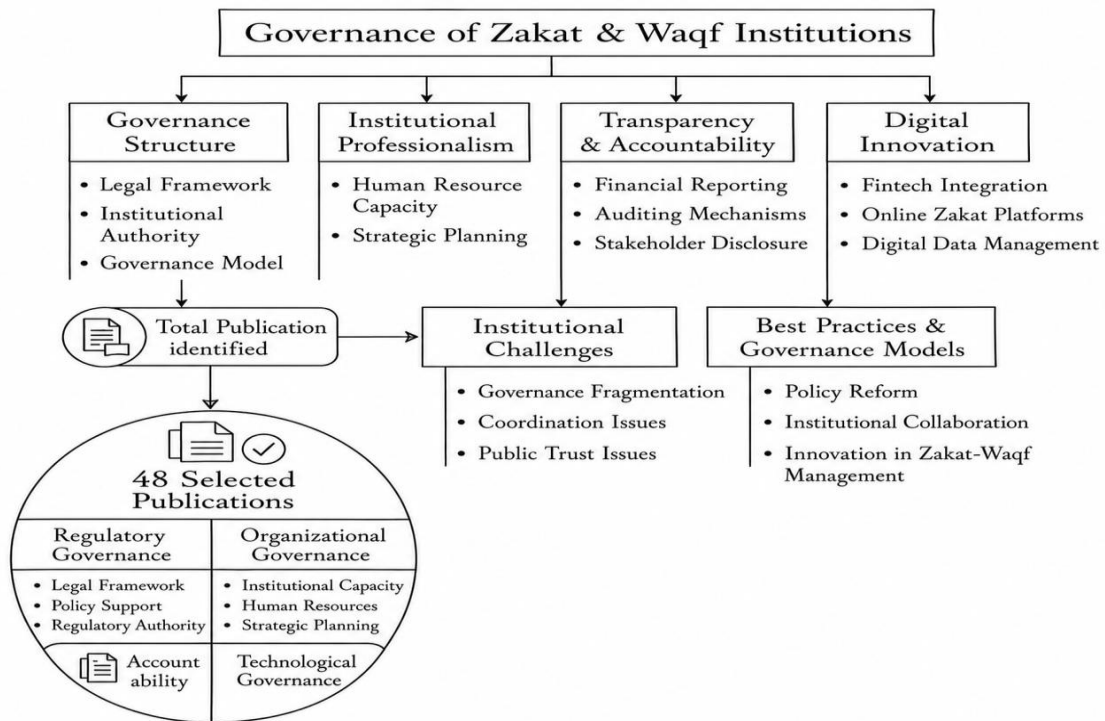
No	Year	Number of Publications	Main Research Focus	Governance Issues Discussed
1	2010	2	National zakat regulation	Weak legal framework
2	2011	2	Zakat institutional governance	Lack of inter-institutional coordination
3	2012	3	Waqf accountability management	Financial transparency issues
4	2013	3	Zakat distribution effectiveness	Inefficient fund distribution
5	2014	3	Productive waqf asset management	Underutilization of waqf assets
6	2015	4	Good governance practices	Lack of operational standards
7	2016	4	Professionalism of amil/nazhir	Human resource limitations
8	2017	4	Institutional governance models	Institutional fragmentation
9	2018	5	Digital transformation in zakat	Low technological adaptation
10	2019	4	Financial accountability	Weak auditing systems
11	2020	4	Digital zakat during COVID-19	Changes in fundraising mechanisms
12	2021	4	Fintech integration	Data security concerns
13	2022	4	Islamic social finance integration	Lack of zakat-waqf synergy
14	2023	3	Sustainable waqf governance	Limited asset optimization
15	2024	3	Innovation and policy reform	Institutional policy reform challenges

To ensure the quality and relevance of the literature included in the analysis, specific inclusion and exclusion criteria were applied. The inclusion criteria consisted of: (1) peer-reviewed journal articles, academic books, and reputable institutional reports; (2) publications discussing governance, institutional management, regulatory frameworks, or operational practices of zakat and waqf institutions; (3) studies focusing on countries with relatively advanced zakat and waqf management systems; and (4) publications available in English. Meanwhile, the exclusion criteria included: (1) articles focusing solely on theological discussions without institutional or governance analysis; (2) publications lacking empirical or



analytical discussion of zakat and waqf management; and (3) duplicate publications or sources with insufficient methodological rigor.

Based on the initial search process, approximately 150 publications were identified across the selected databases. After applying the screening and eligibility criteria, 48 publications were selected for in-depth analysis. These sources consist of peer-reviewed journal articles, policy reports from international organizations, and official documents from zakat and waqf authorities.



**Figure 1.** Governance of Zakat and Waqf Institutions

For the purpose of comparative analysis, this study focuses on three countries that represent relatively advanced governance models in Zakat and Waqf management, namely Indonesia, Malaysia, and Saudi Arabia. Indonesia represents a decentralized yet highly dynamic zakat management system supported by national institutions such as the National Zakat Agency (BAZNAS) and numerous non-governmental zakat organizations. Malaysia represents a centralized and state-regulated zakat governance model managed by state Islamic religious councils and specialized waqf institutions. Meanwhile, Saudi Arabia represents a Middle Eastern model characterized by strong regulatory support and large-scale waqf asset management under government supervision. These countries were selected because they provide diverse institutional contexts and are frequently cited in the literature as examples of relatively developed Islamic philanthropic governance systems.



Table 3. Classification of Research Themes from Selected Studies

Research Theme	Number of Articles	Percentage
Regulatory Governance	12	25%
Organizational Governance	11	22.9%
Accountability and Transparency	10	20.8%
Technological Governance	9	18.8%
Zakat-Waqf Integration	6	12.5%
<b>Total</b>	<b>48</b>	<b>100%</b>

The analysis process was conducted using thematic analysis, which allows the identification of recurring patterns and key themes in the governance and management of zakat and waqf institutions. The thematic coding focused on four main analytical dimensions: (1) governance structures and regulatory frameworks, (2) institutional management and professionalism, (3) transparency and accountability mechanisms, and (4) the adoption of digital technology and financial innovation. Through this approach, the study synthesizes evidence from different sources to identify best practices, institutional challenges, and emerging trends in the governance of zakat and waqf institutions.

By combining systematic literature review techniques with comparative thematic analysis, this study aims to provide a comprehensive and evidence-based understanding of governance practices in Zakat and Waqf management. The findings are expected to generate insights into institutional models that can strengthen transparency, accountability, and socio-economic impact in Islamic philanthropic institutions across different global contexts.

## RESULTS AND DISCUSSION

### Governance Structures of Zakat and Waqf Institutions

The analysis of the selected literature reveals significant variations in governance structures of zakat and waqf institutions across countries. These differences are primarily influenced by legal frameworks, institutional arrangements, and the role of government in regulating Islamic philanthropic activities.

In Indonesia, zakat governance is characterized by a hybrid and decentralized institutional structure involving both government agencies and non-governmental organizations<sup>23</sup>. The National Zakat Agency (BAZNAS) acts as the central coordinating body responsible for regulating and supervising zakat management nationwide, while numerous private zakat institutions (Lembaga Amil Zakat) operate independently to collect and distribute zakat funds<sup>24</sup>. This

<sup>23</sup> Ramadhan and Hayatullah, "Zakat and Waqf Synergies to Accelerating Sustainable Development"; Zulkipli et al., "The Strategic Role of Zakat and Waqf in Sustainable Poverty Alleviation: A Literature Review from the Perspective of Islamic Economics."

<sup>24</sup> Mukhlisin Mukhlisin et al., "Zakat Maal Management and Regulation Practices: Evidence from Malaysia, Turki and Indonesia," *Journal of Human Rights, Culture and Legal System* 4, no. 2 (2024): 569–92; Ahmed, "The Impact of Zakah, Interest, Inflation, and Taxation on Muslims Living in Non-



decentralized model encourages innovation and flexibility in fundraising strategies but also poses challenges related to coordination and standardization across institutions.

In contrast, Malaysia adopts a centralized governance system, where zakat and waqf management is administered by State Islamic Religious Councils (SIRCs)<sup>25</sup>. Each Malaysian state has the authority to regulate zakat collection and distribution within its jurisdiction<sup>26</sup>. This structure allows for strong regulatory oversight and standardized management procedures. Studies indicate that the centralized model contributes to higher levels of institutional accountability and structured financial reporting, although it may limit institutional autonomy and innovation compared to more decentralized systems.

Meanwhile, Saudi Arabia represents a governance model characterized by strong state involvement and institutional integration within the broader national Islamic financial system. Waqf assets in Saudi Arabia are managed through government-supervised endowment authorities and foundations responsible for developing and maintaining waqf properties<sup>27</sup>. The country has successfully developed large-scale waqf projects supporting educational institutions, mosques, healthcare services, and public infrastructure. However, some studies suggest that bureaucratic procedures and regulatory complexity may limit operational flexibility in certain contexts. These comparative findings indicate that governance structures significantly influence the operational effectiveness of zakat and waqf institutions. Countries with well-defined regulatory frameworks and institutional coordination mechanisms tend to demonstrate higher levels of accountability, transparency, and public trust.

### **Institutional Professionalism and Management Practices**

Another key theme emerging from the literature concerns the role of institutional professionalism and managerial capacity in enhancing the effectiveness of zakat and waqf management.

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Islamic Countries"; Ahmed, "The Impact of Zakah, Interest, Inflation, and Taxation on Muslims Living in Non-Islamic Countries."

<sup>25</sup> Dalila Daud, "The Role of Islamic Governance in the Reinforcement Waqf Reporting: SIRC Malaysia Case," *Journal of Islamic Accounting and Business Research* 10, no. 3 (2019): 392–406; Siti Alawiah Siraj, *An Empirical Investigation into the Accounting, Accountability and Effectiveness of Waqf Management in the State Islamic Religious Councils (SIRCS) in Malaysia*, 2012; Ziyaad Mahomed et al., "Case for a Centralized Database for Waqf Administration in Malaysia," *Przestrzeń Społeczna (Social Space)* 23, no. 2 (2023): 55–90.

<sup>26</sup> Azlan Yusof Punding et al., "Zakat Collections and Distributions within Zakat Institutions in Malaysia," *Journal of Emerging Economies & Islamic Research* 12, no. 2 (2024); Shaikh Hamzah Abdul Razak, "Zakat and Waqf as Instrument of Islamic Wealth in Poverty Alleviation and Redistribution: Case of Malaysia," *International Journal of Sociology and Social Policy* 40, nos. 3–4 (2020): 249–66.

<sup>27</sup> Linda Ann Herrera, *The Sanctity of the School: New Islamic Education and Modern Egypt* (Columbia University, 2000); Adam Mestyan and Rezk Nori, "The Probate Regime: Enchanted Bureaucracy, Islamic Law, and the Capital of Orphans in Nineteenth-Century Egypt," *Law and History Review* 40, no. 4 (2022): 597–624; Damas Addeh et al., *Following Islamic Tradition, the Mosque Is Not Only a Place for Worship, but Also a Place for Culture and Education, for the Provision of Health Services and in General, for Social Support and Solidarity*. (Ministry of Waqfs, 1982), 2011.



In Indonesia, many zakat institutions have adopted modern management practices, including strategic planning, performance measurement systems, and professional human resource development. Several major zakat organizations have implemented corporate-style governance structures that incorporate independent oversight boards, internal auditing mechanisms, and professional management teams. These developments reflect a broader trend toward the professionalization of Islamic philanthropic institutions<sup>28</sup>.

Malaysia demonstrates a relatively high level of institutional professionalism due to the structured governance framework established by state authorities. Zakat institutions in Malaysia typically follow standardized operational procedures and financial reporting guidelines. In addition, the integration of zakat management within state-level Islamic governance structures facilitates coordination between zakat institutions and other social welfare programs<sup>29</sup>.

In Saudi Arabia, waqf management has increasingly adopted professional asset management strategies aimed at maximizing the productivity of endowment properties. Recent reforms have emphasized the importance of developing waqf assets through commercial partnerships, real estate investments, and public-private collaborations<sup>30</sup>. Such strategies allow waqf institutions to generate sustainable revenue streams that support long-term social programs. These findings suggest that institutional professionalism plays a crucial role in improving fundraising performance, operational efficiency, and the overall impact of zakat and waqf programs. Organizations that adopt modern management practices tend to demonstrate greater capacity to mobilize resources and deliver targeted social interventions.

### **Transparency and Accountability in Fund Management**

Transparency and accountability are widely recognized as essential components of effective governance in Islamic philanthropic institutions. The literature consistently emphasizes that public trust in zakat and waqf institutions is

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<sup>28</sup> Norazlina Abd Wahab and Abdul Rahim Abdul Rahman, "A Framework to Analyse the Efficiency and Governance of Zakat Institutions," *Journal of Islamic Accounting and Business Research* 2, no. 1 (2011): 43-62; AW Ainol-Basirah and AK Siti-Nabiha, "Accountability in Waqf Institutions: A Meta-Narrative Review," *Journal of Islamic Accounting and Business Research* 14, no. 1 (2023): 181-201; Norazlina Abd Wahab et al., "Towards Empowering Zakat Recipients: An Assessment on Effectiveness of Zakat Institutions from the Zakat Recipients' perspective," *Journal of Critical Reviews* 7, no. 8 (2020): 1586-97.

<sup>29</sup> Jamaliah Said et al., "Relationship between Good Governance and Integrity System: Empirical Study on the Public Sector of Malaysia," *Humanomics* 32, no. 2 (2016): 151-71; Ka Ho Mok, "When State Centralism Meets Neo-Liberalism: Managing University Governance Change in Singapore and Malaysia," *Higher Education* 60, no. 4 (2010): 419-40; Wahab and Rahim Abdul Rahman, "A Framework to Analyse the Efficiency and Governance of Zakat Institutions."

<sup>30</sup> Hasan Awad Al-Qahtani et al., "Smart Management Strategies In The Field of Endowments (AWQAF) And Their Role in The Development of Charity Impact," *Hamdard Islamicus* 43 (2020); Norma Md Saad et al., "Best Practices of Waqf: Experiences of Malaysia and Saudi Arabia," *Journal of Islamic Economics Lariba* 2, no. 2 (2016): 57-74; Said et al., "Relationship between Good Governance and Integrity System: Empirical Study on the Public Sector of Malaysia."



strongly influenced by the perceived integrity and transparency of fund management practices<sup>31</sup>.

In Indonesia, several zakat institutions have implemented transparent financial reporting systems, including publicly accessible annual reports and digital dashboards displaying fundraising and distribution data<sup>32</sup>. These initiatives aim to strengthen donor confidence and enhance institutional credibility.

Malaysia has developed a relatively robust accountability framework through regulatory supervision by State Islamic Religious Councils. Zakat institutions are required to adhere to standardized financial management guidelines and undergo periodic audits to ensure compliance with governance standards<sup>33</sup>.

Saudi Arabia has also undertaken efforts to strengthen transparency in waqf management by introducing regulatory reforms that improve reporting requirements and institutional oversight. These reforms aim to ensure that waqf assets are utilized efficiently and in accordance with their intended charitable objectives<sup>34</sup>. Overall, the literature indicates that transparency mechanisms such as public reporting, independent audits, and digital disclosure systems play a critical role in strengthening institutional legitimacy and encouraging greater participation from donors and stakeholders.

### Digital Innovation and Technological Integration

A notable trend identified in recent literature is the increasing integration of digital technologies in zakat and waqf management. Digital transformation has significantly improved the efficiency, accessibility, and transparency of Islamic philanthropic institutions.

Indonesia and Malaysia are widely recognized as pioneers in digital zakat innovation. Many zakat institutions in these countries have introduced online

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<sup>31</sup> Abbas Ali Rastgar et al., "Following Islamic Teachings in the Governance of Islamic Society with an Emphasis on Transparency," *HTS Teologiese Studies/Theological Studies* 79, no. 1 (2023): 8032; Nik Abdul Rahim Nik Abdul Ghani et al., "Implementation of Shariah Governance in the Charitable Sector: Challenges and Importance from an Islamic Perspective.," *Pakistan Journal of Life & Social Sciences* 22, no. 1 (2024); Al-Qahtani et al., "Smart Management Strategies In The Field of Endowments (AWQAF) And Their Role in The Development of Charity Impact."

<sup>32</sup> Nazira Fadillah and Muji Prasetyo, "The Impact of the Implementation of Sharia Accounting on the Financial Transparency of Zakat Institutions," *Seriat Ekonomisi* 1, no. 4 (2024): 13139–13139; Rastgar et al., "Following Islamic Teachings in the Governance of Islamic Society with an Emphasis on Transparency."

<sup>33</sup> Ahmad Zamri Osman, *Accountability in Managing Waqf Properties: The Case of Two State Religious Councils in Malaysia*, 2012; Hamidah Bani et al., "An Overview of Governance and Accountability of Tahfiz Institutions in Malaysian: Religious Councils Perspective," 36 (2017): 00028; Fadillah and Prasetyo, "The Impact of the Implementation of Sharia Accounting on the Financial Transparency of Zakat Institutions."

<sup>34</sup> Siti Alawiah Siraj, *An Empirical Investigation into the Accounting, Accountability and Effectiveness of Waqf Management in the State Islamic Religious Councils (SIRCS) in Malaysia*, 2012; Siti Alawiah Siraj, *An Empirical Investigation into the Accounting, Accountability and Effectiveness of Waqf Management in the State Islamic Religious Councils (SIRCS) in Malaysia*, 2012; Mohammed Alomair, *Governance and Accountability in Corporate Waqf Institutions in Saudi Arabia*, 2018.



payment platforms, mobile applications, and fintech-based fundraising systems that enable donors to contribute easily and securely<sup>35</sup>. The use of digital platforms also allows institutions to manage large volumes of transactions while maintaining accurate financial records<sup>36</sup>.

In addition, digital technologies facilitate data-driven decision-making in the distribution of zakat funds. Some institutions utilize data analytics to identify eligible beneficiaries, track program outcomes, and monitor the socio-economic impact of zakat programs.

Saudi Arabia has also begun to adopt digital platforms for waqf management, particularly in areas related to asset documentation, financial monitoring, and donor engagement. The digitalization of waqf registries and property management systems has improved administrative efficiency and reduced the risk of asset mismanagement<sup>37</sup>. These developments suggest that digital innovation plays an increasingly important role in modernizing Islamic social finance institutions and improving their operational performance.

### Challenges and Emerging Governance Issues

Despite significant progress in governance reforms and institutional innovation, several challenges remain in the management of zakat and waqf institutions<sup>38</sup>. One major challenge is the lack of standardized governance frameworks across different countries. Variations in legal systems, institutional arrangements, and regulatory approaches create inconsistencies in management practices and performance outcomes<sup>39</sup>.

Another challenge concerns institutional coordination between zakat and waqf organizations. In many countries, these institutions operate independently despite their complementary roles within the broader Islamic social finance ecosystem<sup>40</sup>. Limited coordination may reduce the potential impact of combined philanthropic resources.

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<sup>35</sup> Mukhlishin Mukhlishin et al., "Zakat Maal Management and Regulation Practices: Evidence from Malaysia, Turki and Indonesia," *Journal of Human Rights, Culture and Legal System* 4, no. 2 (2024): 569–92.

<sup>36</sup> Balkis Kasmon et al., "FinTech Application in Islamic Social Finance in Asia Region: A Systematic Literature Review," *International Journal of Ethics and Systems* 41, no. 1 (2025): 213–37; Nor Syahidah Ishak and SHSA Musadik, "Enhancing Co-Creation in Waqf," *Digitalization of Islamic Finance* 335 (2024).

<sup>37</sup> Hiba Ali Abdullah Al-Saudi, *Blockchain Technology and the Potential of Waqf Revival*, 2024; Mohammed Abd-Alkarim Almomani et al., "Exploring Digital Waqf Management: Opportunities and Challenges," *International Journal of Religion* 5, no. 12 (2024): 20–30.

<sup>38</sup> Nur Rasyidah Kamaruzaman and Muhammad Shahrul Ifwat Ishak, "Waqf Institutions: A Systematic Literature Review on Governance, Financial Models, and Socio-Economic Impact in Islamic Social Finance," *Advanced International Journal of Business, Entrepreneurship and SMEs* 5, no. 18 (2023): 134–51.

<sup>39</sup> Kenneth W. Abbott and Duncan Snidal, "The Governance Triangle: Regulatory Standards Institutions and the Shadow of the State," in *The Spectrum of International Institutions* (Routledge, 2021).

<sup>40</sup> Ahmed Tahiri Jouti, "An Integrated Approach for Building Sustainable Islamic Social Finance Ecosystems," *ISRA International Journal of Islamic Finance* 11, no. 2 (2019): 246–66.



Furthermore, public awareness and literacy regarding zakat and waqf remain relatively low in some regions<sup>41</sup>. Limited understanding of institutional governance and program effectiveness may affect donor participation and public trust. Addressing these challenges requires stronger collaboration between governments, religious authorities, and philanthropic organizations in developing governance frameworks that promote transparency, professionalism, and innovation.

### **Toward an Adaptive Governance Model for Zakat and Waqf**

Based on the synthesis of global practices, this study identifies several key governance principles that contribute to effective zakat and waqf management. These principles include: *first*, Strong regulatory frameworks that provide clear guidelines for institutional governance and financial management<sup>42</sup>. *Second*, Professional institutional management supported by trained human resources and modern management systems<sup>43</sup>. *Third*, Transparent accountability mechanisms that strengthen public trust and donor confidence<sup>44</sup>. *Fourth*, Integration of digital technologies to improve operational efficiency and data transparency<sup>45</sup>. And *Fifth*, Collaborative governance approaches that enhance coordination between zakat and waqf institutions<sup>46</sup>.

An adaptive governance model that integrates these elements can enhance the effectiveness of Islamic philanthropic institutions in addressing socio-economic challenges. By combining regulatory oversight, professional management, transparency mechanisms, and digital innovation, zakat and waqf institutions can significantly strengthen their contribution to sustainable development and social welfare.

### **Comparative Governance of Zakat and Waqf Institutions**

Better understanding the variations in governance and management practices, this study compares three countries that represent relatively advanced systems of Zakat and Waqf management: Indonesia, Malaysia, and Saudi Arabia<sup>47</sup>.

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<sup>41</sup> Erwin Dariyanto, "A Role of Literacy in Raising Awareness of Waqf for Sustainable Development," *Sustainability Science and Resources* 7 (2024): 23–38.

<sup>42</sup> Robert C. Gericke et al., *Corporate Governance and Risk Management in Financial Institutions* (Springer, 2018).

<sup>43</sup> Olga Klopova et al., "Professional Development in the Field of Human Resource Management of Heads and Specialists of the Innovative Organizations," *Problems and Perspectives in Management* 16, no. 1 (2018): 214.

<sup>44</sup> JC Agu et al., "Governance and Anti-Corruption Measures in Nigeria: Strategies for Enhancing Transparency, Accountability and Public Trust," *International Journal of Economics and Public Policy* 8, no. 1 (2024): 1–15.

<sup>45</sup> Ehimemhen Okharedia, *The Role of Digital Technologies in Increasing Operational Efficiency in South Africa's Systems Integrator Information Technology Industries*, 2023.

<sup>46</sup> Syahirah Mahmud and Nazrul Hazizi Noordin, "Constructive Collaboration in Ensuring the Sustainability of Waqf Fund in Malaysia: A Case Study of myWakaf Initiative," *Journal of Islamic Social Finance* 2, no. 2 (2024).

<sup>47</sup> Wali Saputra, "Comparison of Waqf Accounting Regulations and Practices: Systematic Literature Review of International Perspectives," *CARONG: Jurnal Pendidikan, Sosial Dan Humaniora* 2, no. 2 (2025): 940–55; Ayu Rosita Anggraini, "Comparison of Zakat Management Paradigms Between



These countries were selected due to their well-documented institutional frameworks, regulatory support, and innovations in Islamic philanthropic governance.

Table 4. Comparative Governance Practices of Zakat and Waqf Institutions

Aspect	Indonesia	Malaysia	Saudi Arabia
Governance Structure	Decentralized-hybrid system involving government (BAZNAS) and numerous private zakat organizations (LAZ). Waqf managed by Indonesian Waqf Board (BWI).	Highly centralized system under State Islamic Religious Councils (SIRC). Zakat and waqf administration regulated at state level.	Strong state-led governance with national endowment authorities supervising waqf institutions and foundations.
Institutional Professionalism	Increasing professionalization with corporate-style governance, strategic planning, and professional human resource management.	Highly structured management systems with standardized procedures and strong regulatory oversight.	Professional asset management approaches focusing on large-scale waqf property development and investment.
Transparency and Accountability	Annual public reports, financial audits, and digital dashboards used by major zakat institutions to enhance donor trust.	Strong regulatory auditing mechanisms under state authorities ensuring standardized	Increasing transparency through regulatory reforms and structured reporting

Indonesia and Malaysia," *Jurnal Pendidikan IPS* 14, no. 2 (2024): 451-56; Raditya Sukmana et al., "Comparison of Government and Private Based Waqf Institutions Management: Case Study of Indonesia and Malaysia," *Labuan E-Journal of Muamalat and Society (LJMS)* 15 (2021): 25-37; Muhammad Anwar Fathoni et al., "Zakat Management Paradigm: Comparison of Indonesia, Malaysia and Saudi Arabia," *INFERENSI: Jurnal Penelitian Sosial Keagamaan* 14, no. 2 (2020): 267-82; Mahmud and Noordin, "Constructive Collaboration in Ensuring the Sustainability of Waqf Fund in Malaysia: A Case Study of myWakaf Initiative."



		reporting practices.	systems for waqf assets.
Digital Innovation	Advanced digital zakat platforms, mobile applications, fintech integration, and online donation systems.	Extensive use of digital payment systems and integrated zakat information management platforms.	Emerging digitalization initiatives, particularly for waqf asset registration and management systems.
Key Governance Challenges	Coordination challenges among numerous zakat institutions; limited standardization across organizations.	Limited flexibility due to centralized regulatory structures; innovation may be slower in some states.	Bureaucratic procedures and regulatory complexity in waqf administration.
Governance Strengths / Best Practices	Innovation-driven fundraising models and strong engagement with civil society organizations.	Strong institutional legitimacy and high accountability due to centralized governance.	Large-scale waqf asset development and strong government support for endowment institutions.

### Discussion of Comparative Findings

The comparative analysis highlights several important patterns in the governance of Zakat and Waqf institutions across the three countries. *First*, governance structures significantly influence institutional flexibility and regulatory control. Indonesia's decentralized model encourages innovation and competition among zakat institutions but also creates coordination challenges. Malaysia's centralized system ensures stronger regulatory control and accountability, though it may limit organizational autonomy. Saudi Arabia's state-driven model emphasizes large-scale institutional management of waqf assets supported by strong regulatory frameworks.

*Second*, institutional professionalism emerges as a critical factor in improving operational effectiveness. Countries that invest in professional management practices, including strategic planning and human resource development,



demonstrate greater capacity to mobilize funds and implement impactful social programs. *Third*, transparency and accountability mechanisms play a crucial role in strengthening public trust. Public reporting systems, independent audits, and regulatory supervision significantly influence donor confidence and participation in zakat and waqf programs.

*Fourth*, digital innovation has become a major driver of institutional modernization. Southeast Asian countries, particularly Indonesia and Malaysia, demonstrate stronger leadership in adopting fintech-based zakat payment systems and digital management platforms. Meanwhile, Middle Eastern countries are increasingly investing in digital infrastructure to improve administrative efficiency in waqf management.

Finally, the analysis reveals that each governance model possesses distinct strengths and limitations, suggesting that there is no single universal governance model for zakat and waqf institutions. Instead, effective governance requires an adaptive approach that integrates regulatory support, professional management, transparency mechanisms, and technological innovation.

## CONCLUSION

This study shows that the effectiveness of zakat and waqf governance is influenced by regulatory frameworks, institutional structures, professionalism, transparency, and digital innovation. Indonesia, Malaysia, and Saudi Arabia apply different governance models, yet all aim to strengthen the sustainability and socio-economic impact of Islamic philanthropic institutions.

Indonesia's decentralized system encourages flexibility and innovation but faces coordination challenges. Malaysia's centralized model promotes stronger accountability and standardized management, while Saudi Arabia emphasizes state integration and productive waqf asset development.

The findings also highlight that professional management, transparency, and accountability are essential for improving institutional performance and public trust. In addition, digital technologies such as fintech platforms and online management systems have enhanced efficiency, accessibility, and monitoring processes.

However, challenges remain, including the lack of standardized governance frameworks, limited institutional coordination, and low public literacy regarding Islamic social finance. Therefore, this study concludes that an adaptive governance model integrating strong regulation, professional management, transparency, digital innovation, and institutional collaboration is crucial for enhancing the role of zakat and waqf in sustainable development and social welfare.

This study has several limitations. First, the analysis is limited to three countries—Indonesia, Malaysia, and Saudi Arabia which may not fully represent the diversity of zakat and waqf governance practices across the Muslim world. Second, the study mainly relies on secondary literature and comparative analysis, without incorporating extensive empirical field data or stakeholder interviews.



Third, differences in legal systems, socio-political contexts, and institutional capacities may affect the generalizability of the findings.

Future research is recommended to conduct broader cross-country comparative studies involving more regions and governance models. Empirical investigations using quantitative and mixed-method approaches are also needed to measure the direct impact of governance quality on institutional performance and socio-economic outcomes. In addition, future studies should explore the role of emerging technologies, such as blockchain and artificial intelligence, in improving transparency, accountability, and efficiency in zakat and waqf management.

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