

Risk-Based Education for Professional Zakat Governance: A Competency-Based Mode

Alfiandri Setiawan^{1*}, Maghfirah², Enggun Nasuha³,

^{1,2}Universitas Islam Negeri Sultan Syarif Kasim Riau, Indonesia

³Islamic University of Madinah, Saudi Arabia

*Corresponding Author : setiawandi963@gmail.com

Abstract

Zakat governance faces challenges in ensuring professionalism, accountability, and effective oversight amid evolving regulatory and institutional frameworks. This article proposes a risk-based educational model for zakat governance based on Constitutional Court Decisions No. 97/PUU-XXII/2024 and No. 54/PUU-XXIII/2025. The study employs normative legal research using statutory, conceptual, case, and Islamic law approaches, integrating agency theory, risk-based supervision, and competency-based education. The findings identify six competency domains: regulatory literacy, financial accountability, sharia auditing, risk-based auditing, digital data governance, and ethics. Audit findings are utilized as learning resources through a case-based risk supervision cycle. The study contributes a risk-based educational model for Islamic philanthropic governance that integrates oversight, competency development, and institutional learning to strengthen professionalism, accountability, and the quality of zakat governance in a sustainable manner.

Keywords: Educational Model, Zakat Governance, Risk-Based

Abstrak

Tata kelola zakat menghadapi tantangan dalam memastikan profesionalitas, akuntabilitas, dan efektivitas pengawasan di tengah perkembangan regulasi dan kelembagaan. Artikel ini mengusulkan model pendidikan tata kelola zakat berbasis risiko berdasarkan Putusan Mahkamah Konstitusi Nomor 97/PUU-XXII/2024 dan Nomor 54/PUU-XXIII/2025. Penelitian menggunakan metode hukum normatif dengan pendekatan perundang-undangan, konseptual, kasus, dan hukum Islam, serta mengintegrasikan teori keagenan, pengawasan berbasis risiko, dan pendidikan berbasis kompetensi. Hasil penelitian mengidentifikasi enam domain kompetensi: literasi regulasi, akuntabilitas keuangan, audit syariah, audit berbasis risiko, tata kelola data digital, dan etika. Temuan audit digunakan sebagai sumber pembelajaran melalui siklus pengawasan berbasis kasus. Kontribusi penelitian ini menawarkan model pendidikan tata kelola filantropi Islam berbasis risiko yang mengintegrasikan pengawasan, pengembangan kompetensi, dan pembelajaran kelembagaan untuk meningkatkan profesionalitas, akuntabilitas, dan mutu tata kelola zakat secara berkelanjutan.

Kata Kunci: Model Pendidikan, Tata Kelola Zakat, Berbasis Risiko

INTRODUCTION

Constitutional Court Decisions No. 97/PUU-XXII/2024 and No. 54/PUU-XXIII/2025 have reignited the debate regarding the governance of zakat management in Indonesia, particularly the relationship between the government, BAZNAS, and LAZ. One of the most important issues is oversight. If the government is positioned as the regulator and supervisor, while Badan Amil Zakat Nasional (BAZNAS) and Lembaga Amil Zakat (LAZ) serve as operators, the next question is how the oversight system should be designed to be objective, proportional, free from conflicts of interest, and enforceable. (Republik Indonesia, 2011; Mahkamah Konstitusi Republik Indonesia, 2025a, 2025b). Legally speaking, these two decisions do not invalidate the entire structure of Law No. 23 of 2011. Decision No. 97/PUU-XXII/2024 dismissed the petition in its entirety, while Decision No. 54/PUU-XXIII/2025 declared part of the petition inadmissible and dismissed the remainder. Nevertheless, the Court's reasoning provides constitutional guidance for lawmakers to restructure the relationship between regulators, supervisors, and operators in the administration of zakat. Therefore, the model formulated in this article is presented as a prescriptive design for regulatory reform, not as a description that this complete separation of powers is already in effect under positive law. (Mahkamah Konstitusi Republik Indonesia, 2025a, 2025b).

Zakat oversight cannot be understood merely as an administrative obligation to receive reports. Zakat is managed as a religious fund with social and Sharia objectives. Therefore, oversight must ensure institutional legality, the accuracy of collection and distribution, Sharia compliance, financial transparency, program effectiveness, the protection of data for both muzaki and mustahik, and follow-up on findings. A weak oversight system can erode public trust, even as fund collection continues to increase (Republik Indonesia, 2014b; Mardiyatillah et al., 2026; Putri et al., 2026).

The scale of national zakat management highlights the urgent need for a more robust oversight system. As of the end of 2025, there were 748 zakat administrators, 728 of whom had submitted reports. Total ZIS-DSKL collections reached Rp44.698 trillion, while distribution and utilization amounted to Rp44.288 trillion. These figures indicate a high level of institutional activity. However, a high reporting rate does not automatically guarantee the quality of oversight, the quality of audits, the accuracy of programs, or follow-up on findings. (Badan Amil Zakat Nasional, 2026).

Previous studies have examined the accountability and transparency of zakat management agencies, Sharia audits, information system integration, and licensing requirements for LAZs (Wulaningrum & Pinanto, 2020; Umiyati et al., 2023; Fitri et al., 2024; Riyanto & Fakkanna, 2024; Kurnia et al., 2025; Mardiyatillah et al., 2026). However, such discussions tend to treat audits, regulations, technology, and competency development as separate issues. Few studies conducted following the Constitutional Court's ruling have linked risk stratification, audit design, administrative correction mechanisms, and findings-based competency development within a single oversight cycle. This gap forms the academic focus of this article.

This article proposes a risk-based oversight model for zakat management. This model was developed to address the design gaps left by the Constitutional Court's ruling: who oversees, what is being overseen, how the intensity of oversight is determined, what audit instruments are used, how oversight findings are followed up, and how regulatory decisions can be corrected. Thus, this article focuses on recommendations for an oversight system, rather than merely the distribution of institutional authority. The research gap this study aims to fill lies in the lack of connection between the zakat oversight design and mechanisms for developing the competencies of those responsible for implementation. The novelty of this article lies in treating oversight results as educational feedback: risk profiles determine audit priorities, audit findings map competency gaps, and case-based education is designed to prevent recurring findings. With this framework, governance education is not treated as a normative add-on but as an integral part of the oversight architecture itself.

The research gap to be addressed in this study lies in the lack of integration between the zakat oversight design and the mechanisms for educating and developing the competencies of zakat administrators. The novelty of this article lies in the construction of a cycle of oversight–learning–competency strengthening, in which risk profiles determine audit priorities, audit findings identify competency gaps, and evaluation results serve as the basis for developing case-based training. The training is aimed at strengthening regulatory literacy, financial accountability, Sharia auditing, risk management, digital governance, and professional ethics. With this framework, zakat governance training is no longer positioned as an additional activity but as a structural component within the oversight architecture designed to prevent the recurrence of errors, enhance professionalism, and foster a culture of sustainable accountability.

RESEARCH METHODS

This study is a normative legal study that examines the design of oversight mechanisms for zakat management based on legal norms, Constitutional Court decisions, theories of authority and oversight, the rule of law, and the principle of public interest in Islamic law. Primary legal sources include Law No. 23 of 2011, Law No. 30 of 2014, Law No. 27 of 2022, Government Regulation No. 14 of 2014, Minister of Religious Affairs Regulation No. 19 of 2024, and Constitutional Court Decisions No. 97/PUU-XXII/2024 and No. 54/PUU-XXIII/2025. Secondary data consist of official reports, journal articles, audit standards, and regulations related to zakat management, accountability, auditing, information systems, and personal data protection. The analysis uses a qualitative-prescriptive approach to assess weaknesses in the existing oversight system, compare them with principles of oversight free from conflicts of interest, and formulate a risk-based oversight model.

The analysis was conducted through four stages. First, regulatory mapping identified the roles of regulators, operators, entities subject to oversight, and corrective mechanisms. Second, risk mapping categorized factors that may increase the likelihood or impact of noncompliance, including the amount of funds, network complexity, recurring

findings, complaints, and digital dependency. Third, each oversight instrument was mapped against the competencies required for its implementation, including regulatory, auditing, Sharia, data, and accountability literacy. Fourth, the results were synthesized into an operational supervision-learning model and competency framework for governance education. The selection of risk indicators and competency domains was based on a cross-analysis of legal materials, oversight standards, and governance literature, with each risk mapped to the objects monitored, assurance instruments, potential follow-up actions, and required competencies (Bank Indonesia, BAZNAS, & IRTI-IDB, 2016; The Institute of Internal Auditors, 2024).

Because this research is normative-prescriptive, the six competency domains and educational indicators are positioned as normative constructs derived from task requirements and identified risks, rather than as results of empirical measurement or verified causal relationships. Accordingly, the proposed supervision-learning cycle and competency framework constitute propositions for further empirical testing.. (Bank Indonesia, BAZNAS, & IRTI-IDB, 2016; The Institute of Internal Auditors, 2024).

RESULTS AND DISCUSSION

Risk-Based Supervision, Agency, and Accountability

The first framework is risk-based oversight. According to the Global Internal Audit Standards, the effectiveness of oversight is supported by independence, objectivity, competence, risk-aligned planning, adequate execution of assignments, communication of results, and monitoring of follow-up plans. (The Institute of Internal Auditors, 2024). Equality in oversight standards is not synonymous with uniformity in audit intensity: high-risk institutions require greater depth, frequency, and scope of audits.

In addition to the Global Internal Audit Standards, the design of zakat oversight should be considered in conjunction with the Zakat Core Principles (ZCP). The ZCP treats the legal framework, zakat supervision, governance, intermediary functions, risk management, and Sharia compliance as interrelated components. This framework emphasizes the importance of clear supervisory authority, a risk-based approach, adequate governance, and corrective actions. Thus, IIA standards are used to strengthen the assurance dimension and audit processes, while the ZCP serves as the sector-specific reference for zakat oversight. (Bank Indonesia, BAZNAS, & IRTI-IDB, 2016). This framework is reinforced by agency theory. In the context of zakat management, there is a separation between the party that entrusts resources and public interests and the party that manages them. This separation can give rise to information asymmetry, conflicting interests, and monitoring costs. Agency theory explains that mechanisms such as reporting, independent verification, incentives, and sanctions are necessary to minimize agency costs and moral hazard. (Jensen & Meckling, 1976).

In the context of zakat, this relationship exists not only between regulators and operators but also involves the muzaki, the mustahik, the public, and the state. Therefore, accountability must be established as a process of answerability and correction:

administrators are required to explain their actions and results, while regulators must have the tools to examine, evaluate, and address deviations in a proportionate manner.

Competency-Based Education and Experiential Learning

The second framework views education as a mechanism for building competencies, not merely the transfer of information. Competency-based education is grounded in outcomes that can be demonstrated through knowledge, skills, and professional attitudes. For zakat management, these outcomes must be derived from real-world job risks: understanding regulations, reading reports, identifying Sharia violations, assessing internal controls, managing data, and developing follow-up actions.

This approach aligns with the learning needs of adults, which are increasingly tied to evolving job skills and digital transformation. (OECD, 2025; Anamisari et al., 2026; Bisri et al., 2026; Hanin et al., 2026)

From a pedagogical perspective, experiential learning is relevant for explaining how governance competencies are developed. The experiential learning cycle views concrete experiences, reflection, conceptualization, and active experimentation as interconnected processes (Kolb, 1984). Therefore, cases involving audits, late reporting, conflicts of interest, data breaches, or misdirected distributions can be used as learning scenarios. Participants are not only expected to know the rules but also to identify risks, determine the necessary evidence, select audit procedures, formulate recommendations, and justify their decisions. This framework provides a theoretical basis for the use of simulations and case-based learning in zakat governance education (Uyun et al., 2026).

Weaknesses in Oversight of Zakat Governance

First, oversight of zakat management has so far faced several shortcomings. First, the division of roles among regulators, coordinators, operators, and supervisors is not yet fully defined. This situation risks blurring the lines between operational and supervisory functions. If an institution that performs operational functions also exerts influence over other operators, the objectivity of the oversight may be called into question (Republik Indonesia, 2011; Mahkamah Konstitusi Republik Indonesia, 2025a, 2025b).

Second, oversight is still often understood solely in terms of periodic reporting. In reality, reporting is just one of the tools. Regulators also need to assess the quality of reports, compliance with accounting and Sharia standards, the effectiveness of internal controls, the traceability of funds, the accuracy of program targets, and the follow-up on audit findings. Without an assessment of these aspects, oversight merely results in formal compliance, not substantive accountability. (Wulaningrum & Pinanto, 2020).

Third, the zakat information system is not yet fully integrated at the national level. Data fragmentation makes it difficult for regulators to compare the performance of institutions, identify eligible recipients, assess risks, and avoid program overlaps (Riyanto & Fakkanna, 2024). On the other hand, data integration also poses new risks related to information security and the protection of personal data. Therefore, the oversight system

must balance public transparency with restrictions on access to the identities of donors and recipients. (Republik Indonesia, 2022; Rahmatullah et al., 2024).

Functional Supervisors within the Ministry of Religious Affairs

The oversight model proposed in this article designates the Ministry of Religious Affairs as the body responsible for regulatory and oversight functions. These functions can be carried out through a functionally independent oversight unit. Functionally independent means that the unit is part of the government structure but operates based on audit standards, is free from dual roles with operators, and has no conflict of interest with either BAZNAS or LAZ. This oversight unit should include auditors, Sharia experts, administrative law experts, information technology experts, and members of the public.

Cross-disciplinary involvement is necessary because the scope of zakat oversight extends beyond financial reports to include Sharia compliance, institutional legality, program effectiveness, and data governance. The unit must have the authority to request documents, seek clarifications, examine systems, issue recommendations, monitor follow-up actions, and propose administrative sanctions. (Kurnia et al., 2025).

The composition and authority of this supervisory unit constitute a proposed policy framework, not powers that have been fully granted under current positive law. Its formulation is based on the need for functional separation, multidisciplinary expertise, and adequate supervisory authority within the ZCP; therefore, its implementation still requires an explicit legal basis through amendments to laws and implementing regulations. (Bank Indonesia, BAZNAS, & IRTI-IDB, 2016).

Oversight of BAZNAS and LAZ must be based on the principle of equality. This means that all zakat administrators are subject to basic standards of integrity, reporting, auditing, and data protection. However, the intensity of inspections may vary depending on each institution's risk level. Institutions with large fundraising volumes, extensive networks, recurring violations, or high digital risks must be subject to more intensive oversight than those with low risk. (The Institute of Internal Auditors, 2024; Hidayah et al., 2026).

Layered and Risk-Based Audits

Zakat oversight requires a multi-layered audit approach. Financial audits assess the accuracy of record-keeping, fund management, and reporting. Sharia audits assess the compliance of collection, distribution, and utilization with zakat principles. Compliance audits assess adherence to licensing requirements, reporting obligations, governance standards, and regulatory provisions. Performance audits assess the benefits of programs for mustahik (Maghfirah et al., 2026), while information technology audits assess system security, data reliability, and the protection of personal information. (Republik Indonesia, 2014b; Mardiyatillah et al., 2026).

A risk-based approach means that the frequency and depth of inspections are not determined uniformly for all institutions. Regulators need to establish risk indicators,

including the amount of assets under management, the extent of the service network, reporting delays, recurring audit findings, weak internal controls, public complaints, uncontrolled changes in management, reliance on digital systems, and a history of administrative sanctions. The higher the risk, the more intensive the audits and monitoring will be. (The Institute of Internal Auditors, 2024; Hidayah et al., 2026).

Each audit report must include the risk level, a description of the findings, the basis for the assessment, recommendations, the responsible parties, a deadline for resolution, and the consequences of failure to follow up. With this format, audits are not merely formal documents but become instruments for institutional improvement. Regulators must also monitor the follow-up on findings and publish the resolution status in the form of aggregated information.

Mechanisms for Objections and Review of Decisions

A robust oversight system must be balanced by mechanisms for correcting regulatory decisions and/or actions that have legal consequences. The law must provide for administrative remedies against the denial, suspension, or revocation of licenses, corrective orders, and the imposition of administrative sanctions. The results of an inspection are not, in and of themselves, always subject to administrative remedies; what may be challenged are the administrative decisions or actions issued based on those inspection results. Every decision must be made in writing and must include the facts, legal basis, considerations, the substance of the decision, and the procedure for filing an objection. (Republik Indonesia, 2014a; Safiuddin et al., 2024).

The appeals process can be conducted in stages. The initial appeal is filed with the official who issued the decision. If the aggrieved party remains dissatisfied with the outcome, an administrative appeal may be filed with a superior official or a different administrative review board. (Masbait et al., 2025). After all administrative remedies have been exhausted, the aggrieved party may still file a lawsuit with the Administrative Court in accordance with administrative law (Safiuddin et al., 2024; Masbait et al., 2025).

The relationship between administrative remedies and access to administrative courts must also be viewed within the framework of Supreme Court Regulation No. 6 of 2018, which governs the resolution of administrative disputes after administrative remedies have been exhausted. Thus, administrative objections and appeals serve as internal corrective mechanisms before a dispute is brought to court (Mahkamah Agung Republik Indonesia, 2018; Hudoprakoso, 2022). This mechanism is essential to ensure that oversight does not become a tool for unilateral power. The regulator retains the authority to impose administrative sanctions, but every action must be subject to review. This principle strengthens legal certainty for BAZNAS and LAZ and protects the interests of muzaki and mustahik.

Information System Integration and Data Protection

Risk-based supervision requires an integrated information system. This system must include data on institutions, licensing, fund collection, disbursement, utilization,

programs, financial reports, audits, public complaints, sanctions, and follow-up on findings. The data must adhere to the same standards and formats to ensure comparability across regions and institutions (Riyanto & Fakkanna, 2024).

The government is responsible for establishing the governance of the information system, while BAZNAS and LAZ are responsible for updating data in a timely and accurate manner. Within this system, a distinction must be made between public data and restricted data. Information regarding total collections, total disbursements, program types, aggregate audit results, reporting compliance, and follow-up status may be made available to the public. Conversely, the identities of donors (muzaki) and recipients (mustahik), as well as account information, health data, and individual socioeconomic data, must be protected in accordance with Law No. 27 of 2022 on the Protection of Personal Data. (Republik Indonesia, 2022; Rahmatullah et al., 2024).

Information systems also need to shift their focus from measuring outputs to measuring outcomes. Success cannot be judged solely by the amount of funds disbursed or the number of beneficiaries, but must also take into account changes in income, business sustainability, ownership of productive assets, access to education, skills, and the self-reliance of zakat recipients. Thus, oversight is not only about ensuring compliance but also about assessing whether zakat truly brings about public benefit (Maghfirah et al., 2026).

Operational Oversight Model

The risk-based zakat oversight model is implemented as a cycle that begins with risk identification, audit planning, examination, follow-up, and concludes with administrative actions. Risk identification is conducted by assessing institutional aspects, the amount of funds, the quality of reports, audit findings, complaints, and technological risks. The results of the assessment are used to determine the type, frequency, and scope of audits based on the risk level of each BAZNAS and LAZ (The Institute of Internal Auditors, 2024; Mardiyatillah et al., 2026).

The results of the investigation must include findings, recommendations, the responsible party, and a deadline for resolution. The regulator then monitors the follow-up and may impose proportionate administrative sanctions if violations are found or if recommendations are not implemented. The aggrieved party retains the right to pursue administrative remedies and to file a lawsuit in administrative court. (Masbait et al., 2025).

Oversight must also be supported by public transparency through the presentation of aggregate data on collection, distribution, compliance, audits, and follow-up. Such transparency must still ensure the protection of the personal data of muzaki and mustahik. Thus, risk-based oversight not only serves to identify violations but also strengthens accountability and public trust in the management of zakat (Mardiyatillah et al., 2026; Rahmatullah et al., 2024).

A synthesis of legal theory and materials leads to the finding that effective oversight must be framed as an institutional learning cycle. The first stage is risk sensing, which involves identifying changes in the risk profile through reporting data, previous audits, complaints, changes in management, and digital systems. The second stage is the assurance

response, which involves selecting the type of audit and the depth of the examination based on the risk. The third stage is corrective action, which involves recommendations, designated responsible parties, deadlines, and monitoring.

The fourth stage is competency response, which entails identifying whether recurring findings stem from unclear standards, weak systems, a lack of competence, or breaches of integrity. Only in the category of competency gaps do education and training serve as the primary interventions. This finding is significant because not all deviations can be resolved through training. Failures stemming from system design require improvements to controls, while intentional violations require enforcement mechanisms and sanctions.

Conversely, errors resulting from an inability to interpret regulations, weak documentation, or low digital literacy are best addressed through competency development. Distinguishing these causes prevents education from being treated as a one-size-fits-all solution for all problems and makes follow-up oversight more precise. Conceptually, this model expands the function of audits from a detection mechanism to a source of evidence-based learning. The pattern of findings can.

Implications for Risk-Based Zakat Governance Education Competencies

A risk-based oversight model has implications for education because the success of the system depends not only on the existence of norms and procedures, but also on the competence of the people who implement them. Education and training for zakat administrators, auditors, and managers must integrate regulatory literacy, financial reporting, Sharia auditing, internal controls, information technology, and data protection. This integration is essential so that oversight standards are understood as part of a culture of accountability, rather than merely an administrative obligation. (The Institute of Internal Auditors, 2024; Mardiyatillah et al., 2026; Rahmatullah et al., 2024; Erifsany et al., 2026; Setianingsih et al., 2026).

Training can be designed based on case studies and risk profiles. Examples such as late reporting, recurring findings, public complaints, internal control failures, or data breaches can serve as simulation materials to develop the ability to identify risks, determine the type of audit, formulate recommendations, and monitor follow-up actions. With this approach, zakat governance education serves as a preventive tool that prepares administrators to make proportionate decisions and link compliance to social outcomes for mustahik. (Hidayah et al., 2026; Maghfirah et al., 2026; Nazah et al., 2026).

The educational dimension also reinforces the sustainability of the oversight model. Regulatory updates or digital systems must be accompanied by structured competency development programs and periodic evaluations. Thus, oversight reforms following the Constitutional Court's ruling do not stop at institutional changes, but are followed by the development of the professional capacity and accountability literacy necessary to maintain public trust.

In order for the educational implications to be implemented operationally, the competencies of zakat administrators and supervisors need to be developed based on the

types of risks and tasks they face. These competencies include regulatory literacy, financial accountability, Sharia auditing, risk-based auditing, digital data governance, as well as ethics and follow-up. Each domain needs to be translated into learning outcomes, learning strategies, and measurable evaluation indicators. (The Institute of Internal Auditors, 2024; Mardiyatillah et al., 2026).

Learning can take place through case studies, audit simulations, financial statement reviews, risk assessments, Sharia compliance reviews, and simulations of data management and conflicts of interest. This approach enables participants not only to understand the norms but also to identify risks, formulate recommendations, ensure Sharia compliance, and protect the data of both muzaki and mustahik in the practice of zakat management (Mardiyatillah et al., 2026; Rahmatullah et al., 2024).

Thus, this competency framework can be used as the basis for developing modules, training programs, assessments, and internal certification without altering the institution's legal authority. The goal is to ensure that human resource capacity develops in line with the demands of accountability, risk-based oversight, Sharia compliance, and professional zakat governance. (The Institute of Internal Auditors, 2024; Mardiyatillah et al., 2026).

Evaluation of the Effectiveness of Education and Reinforcement of Learning Outcomes

Educational evaluation should be conducted at three levels. The first level is learning outcomes, which measure improvements in knowledge and analytical skills through pre-tests/post-tests, scenario-based questions, or portfolio assessments. The second level is transfer to work, which assesses participants' ability to apply competencies to real-world documents, audits, controls, and decisions.

The third level is organizational outcomes, which are observed through indicators such as a reduction in recurring findings, improved timeliness of reporting, accelerated resolution of follow-up actions, a decrease in data incidents, and improved quality of recommendations. This tiered approach aligns with training evaluations that link learning outcomes, behavioral changes in the workplace, and organizational results. (Kirkpatrick Partners, 2024; OECD, 2025; Ardondi et al., 2026). The Kirkpatrick model distinguishes between evaluations at the levels of learning, behavior, and results, while the OECD emphasizes the relevance of adult learning to workplace needs and skills.

In practice, organizational indicators cannot be used as the sole measure, as the success of learning transfer is also influenced by participant characteristics, training design, the work environment, and organizational support. Therefore, evaluations must integrate participant assessment results, evidence of application in the workplace, and monitoring data. The results of these evaluations can be used to tailor the intensity of learning to the organization's needs and risk level, thereby ensuring that training becomes an evidence-based intervention aligned with the organization's needs. (Shukla et al., 2024; OECD, 2025; Ardondi et al., 2026).

CONCLUSION

This study concludes that zakat governance following the Constitutional Court's rulings requires a shift from a formal-administrative approach toward risk-based oversight that integrates functional independence, risk stratification, multi-layered auditing, follow-up mechanisms, and competency-based education. The proposed model positions the Ministry of Religious Affairs as the regulator and supervisor through a functionally independent unit, while BAZNAS and LAZ serve as zakat management operators subject to supervision. Risk profiles provide the basis for determining audit priorities and intensity, supported by financial, Sharia, compliance, performance, and information technology audits, as well as integrated information systems and personal data protection. From an Islamic legal perspective, the principles of *amanah* and *hifz al-māl* reinforce the framework by directing oversight not only toward regulatory compliance but also toward protecting zakat assets and the welfare of *muzaki* and *mustahik*. The main contribution of this study lies in integrating education into the institutional oversight architecture through six competency domains: regulatory literacy, financial accountability, Sharia auditing, risk-based auditing, digital data governance, and ethics and follow-up. Audit findings are positioned as diagnostic learning resources for identifying gaps in knowledge, skills, and professional ethics, thereby establishing an oversight–learning–competency strengthening cycle. The model framework proposed in this study positions oversight not merely as a corrective instrument, but as a means of continuous learning and institutional strengthening. This approach paves the way for the development of a zakat governance system that is more responsive to regulatory changes, risks, and technological advancements.

Theoretically, this study explores the intersection of agency theory, *risk-based assurance*, and competency-based education by conceptualizing education as a strategic mechanism for strengthening institutional accountability and fostering continuous improvement in zakat governance. Rather than treating education merely as a supporting function, the framework examines how competency development may contribute to risk identification, accountability, regulatory compliance, and institutional resilience. Practically, the model explores case-based and risk-profile learning, positioning audit findings as dynamic resources for curriculum development, competency enhancement, and educational evaluation. This approach encourages an iterative relationship between oversight, organizational learning, and competency development. However, the study is limited by its normative-prescriptive approach, as the proposed governance structure and six competency domains have not yet been empirically validated across BAZNAS, LAZ, or government oversight units. Accordingly, the model is positioned as an exploratory conceptual framework rather than a representation of mechanisms fully established under positive law. Future research should explore its applicability through expert validation, curriculum piloting, pre- and post-training assessments, and longitudinal studies examining relationships among competency development, audit findings, compliance quality, institutional accountability, and organizational performance.

REFERENCES

- Ardondi, M., Fortunato, E., Ruozzi, C., Di Fronzo, P., Saffioti, A., Ferrari, I., Bassi, M. C., Ghirotto, L., & Pedroni, C. (2026). Workplace training transfer: A systematic scoping review of evaluation tools for adult learning. *Journal of Workplace Learning*, 38(1), 1–21. <https://doi.org/10.1108/JWL-03-2025-0068>
- Auda, J. (2008). *Maqasid al-Shariah as philosophy of Islamic law: A systems approach*. London: International Institute of Islamic Thought.
- Anamisari, F., Nuraini, L., Inayatillah, N., Afkar, M. A., Parahita, I. E., Nisrina, R., & Johar, A. (2026). Contextual and transformative Islamic learning models: A study of Fatah Syukur's thoughts. *AFHAMUNA: Journal of Islamic Thought*, 1(1), 42–52. <https://doi.org/10.66928/afhamuna.v1i1.24>
- Badan Amil Zakat Nasional. (2026). *Laporan Pengelolaan Zakat Nasional Akhir Tahun 2025*. Jakarta: Biro Koordinasi, Kerja Sama, dan Harmonisasi BAZNAS.
- Bank Indonesia, BAZNAS, & IRTI-IDB. (2016). *Prinsip-prinsip pokok untuk penyelenggaraan dan pengawasan zakat yang efektif (Zakat Core Principles)*. Jakarta: Bank Indonesia.
- Bisri, H., Dini, S. S. T., & Rahman, M. L. (2026). From cognitive to holistic: Implementation of moderate Islamic education at the elementary level. *SALIMA: Journal of Islamic Education*, 1(1), 1–12. <https://doi.org/10.66928/salima.v1i1.35>
- Erifsany, N. S. W., Dakir, D., & Najah, T. S. (2026). Pengembangan standar mutu pendidikan pesantren dalam merespons tantangan era globalisasi. *SALIMA: Journal of Islamic Education*, 1(2), 98–110. <https://doi.org/10.66928/salima.v1i2.76>
- Fitri, Y., Rini, & Amilin. (2024). Transparansi dan akuntabilitas organisasi pengelola zakat. *Jurnal Bimas Islam*, 17(1), 215–243.
- Hanin, Y. M., Khusna, L. K., Fatmawati, D., Oktaviasari, F., & Aulia, N. R. (2026). The challenges and opportunities of Islamic education in the globalization era: Insights from Azyumardi Azra's thought. *AFHAMUNA: Journal of Islamic Thought*, 1(3), 292–304. <https://doi.org/10.66928/afhamuna.v1i3.97>
- Hidayah, N. R., Mattulada, A., & Muliati. (2026). From accountability to trust: Strengthening zakat institutions in emerging economies. *Invoice: Jurnal Ilmu Akuntansi*, 8(1), 103–119. <https://doi.org/10.26618/gjnr546>
- Hudoprakoso, P. (2022). Pemberlakuan upaya administrasi sebagai primum remedium dalam penyelesaian sengketa tata usaha negara. *Jurnal JURISTIC*, 3(1).
- Jensen, M. C., & Meckling, W. H. (1976). Theory of the firm: Managerial behavior, agency costs and ownership structure. *Journal of Financial Economics*, 3(4), 305–360.
- Kementerian Agama Republik Indonesia. (2024). *Peraturan Menteri Agama Nomor 19 Tahun 2024 tentang Lembaga Amil Zakat*.
- Kirkpatrick Partners. (2024). *The Kirkpatrick Model*. Kirkpatrick Partners.
- Kolb, D. A. (1984). *Experiential Learning: Experience as the Source of Learning and Development*. Englewood Cliffs, NJ: Prentice-Hall.
- Kurnia, F., Asropi, & Karunia, R. L. (2025). Studi implementasi kebijakan pelayanan pemberian izin pembentukan Lembaga Amil Zakat di Indonesia: Studi kasus di

- Kementerian Agama. *Journal of Public Policy and Applied Administration*, 7(2), 41-50. <https://doi.org/10.32834/jplan.v7i2.931>
- Maghfirah, Maulidizen, A., & Rizapoor, H. (2026). Assessing the alignment of zakat allocation with the Sustainable Development Goals: An empirical analysis of poverty and education outcomes. *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi*, 9(1), 61-88. <https://doi.org/10.24090/volksgeist.v9i1.15472>
- Mahkamah Agung Republik Indonesia. (2018). Peraturan Mahkamah Agung Nomor 6 Tahun 2018 tentang Pedoman Penyelesaian Sengketa Administrasi Pemerintahan Setelah Menempuh Upaya Administratif.
- Mahkamah Konstitusi Republik Indonesia. (2025a). Putusan Nomor 97/PUU-XXII/2024 perihal Pengujian Undang-Undang Nomor 23 Tahun 2011 tentang Pengelolaan Zakat.
- Mahkamah Konstitusi Republik Indonesia. (2025b). Putusan Nomor 54/PUU-XXIII/2025 perihal Pengujian Undang-Undang Nomor 23 Tahun 2011 tentang Pengelolaan Zakat.
- Mardiyatillah, S., Mahdi, M. I., & Asyrorroji, M. J. (2026). Financial reporting governance in zakat management institutions: Exploring transparency, accountability, and the role of sharia audit from an Islamic economics perspective. *I-ECONOMICS: A Research Journal on Islamic Economics*, 12(1), 75-90. <https://doi.org/10.19109/ieconomics.v12i1.36636>
- Masbait, P. J., Salmon, H., & Pattipawae, D. R. (2025). Kekuatan hukum tindakan administratif dalam penyelesaian sengketa administrasi negara. *Rechtsidee*, 13(2). <https://doi.org/10.21070/jihr.v13i2.1082>
- Nazah, M. F., Nurochman, & Najah, S. (2026). From quantity to quality: Integrative management in the Quran memorization (Tahfidz) program at Madrasah Ibtidaiyah. *SALIMA: Journal of Islamic Education*, 1(3), 137-148. <https://doi.org/10.66928/salima.v1i3.140>
- OECD. (2025). Trends in Adult Learning: New Data from the 2023 Survey of Adult Skills. Paris: OECD Publishing. <https://doi.org/10.1787/ec0624a6-en>
- Putri, W. C., Khaerunisa, I., Nafisah, M., & Khunaifi, A. (2026). Tinjauan historis terhadap eksistensi pesantren dan madrasah di Indonesia. *SALIMA: Journal of Islamic Education*, 1(2), 74-85. <https://doi.org/10.66928/salima.v1i2.63>
- Rahmatullah, I., Suwadi, P., & Purwadi, H. (2024). Legal reform of zakat management based on personal data protection law in Indonesia. *Mazahib*, 23(1), 199-236. <https://doi.org/10.21093/mj.v23i1.5917>
- Republik Indonesia. (2011). Undang-Undang Nomor 23 Tahun 2011 tentang Pengelolaan Zakat.
- Republik Indonesia. (2014a). Undang-Undang Nomor 30 Tahun 2014 tentang Administrasi Pemerintahan.
- Republik Indonesia. (2014b). Peraturan Pemerintah Nomor 14 Tahun 2014 tentang Pelaksanaan Undang-Undang Nomor 23 Tahun 2011 tentang Pengelolaan Zakat.
- Republik Indonesia. (2022). Undang-Undang Nomor 27 Tahun 2022 tentang Pelindungan Data Pribadi.

- Riyanto, D., & Fakkanna, M. (2024). Enhancing zakat governance: Implementation of the SIMBA system across BAZNAS levels. *International Journal of Zakat*, 9(2), 92-99. <https://doi.org/10.37706/ijaz.v9i2.506>
- Safiuddin, S., La Sensu, Tatawu, G., Dewa, M. J., Heryanti, & Tonakka. (2024). Analisis hukum upaya administratif dalam penyelesaian sengketa keputusan tata usaha. *Halu Oleo Legal Research*, 6(3), 775-779. <https://doi.org/10.33772/holresch.v6i3.416>
- Setianingsih, D., Najah, T. S., & Dakir, D. (2026). Standar kompetensi lulusan pendidikan Ma'had Aly dan problematika implementasinya. *SALIMA: Journal of Islamic Education*, 1(3), 127-136. <https://doi.org/10.66928/salima.v1i3.90>
- Shukla, A., Dash, S., & Kumar, A. (2024). Factors affecting transfer of online training: A systematic literature review and proposed taxonomy. *Human Resource Development Quarterly*, 35(3), 363-390. <https://doi.org/10.1002/hrdq.21518>
- The Institute of Internal Auditors. (2024). Global Internal Audit Standards. Lake Mary: The Institute of Internal Auditors.
- Umiyati, Muhibuddin, Habibullah, & Rini. (2023). Peran audit syariah dalam meningkatkan akuntabilitas pada organisasi pengelola zakat. *Jurnal Bimas Islam*, 16(2), 313-342.
- Uyun, Q., Sholikhah, & Susilo, A. (2026). Tawhidic ontology and the reconstruction of Islamic education: A counter-hegemonic response to neoliberalism. *AFHAMUNA: Journal of Islamic Thought*, 1(4), 381-397. <https://doi.org/10.66928/afhamuna.v1i4.142>
- Wulaningrum, P. D., & Pinanto, A. (2020). Akuntabilitas dan transparansi laporan keuangan pada organisasi pengelola zakat: Studi komparatif di BAZ dan LAZ Yogyakarta. *Jati: Jurnal Akuntansi Terapan Indonesia*, 3(1), 15-24. <https://doi.org/10.18196/jati.030122>