

## Parliamentary Oversight of the Performance of the Executive Authority in Light of Islamic Sharia Positive Constitutional Systems: A Comparative Analytic Study

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### ABSTRACT

This study examines the effectiveness of parliamentary oversight over the executive authority through a comparative analytical framework between Islamic Sharia and contemporary constitutional systems. The study adopts a comparative analytical methodology based on textual analysis of Sharia sources and constitutional frameworks, supported by selected contemporary case references such as Kuwait. The findings reveal that Islamic oversight is value-based and internally driven through principles such as hisbah and enjoining good, while constitutional systems rely on formal institutional mechanisms such as parliamentary questioning and investigative committees. The study argues that an integrated model combining ethical accountability with institutional enforcement offers a more sustainable oversight framework. The study contributes to contemporary Islamic legal discourse by proposing a hybrid oversight model that enhances transparency, accountability, and governance effectiveness.

### KEYWORDS

*Parliamentary oversight, Islamic law, positive constitutions accountability, governance, transparency.*

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## INTRODUCTION

Parliamentary oversight of government actions is one of the most important tools for ensuring transparency and accountability in any political system. It constitutes one of the fundamental foundations upon which a democratic system relies to ensure that the executive branch is subject to the laws and that the nation's interests are achieved. Al-Faqih (2002) emphasized that parliamentary oversight accountability contributes to strengthening within the political system. Parliamentary oversight in Western systems began in parallel

with the emergence of parliamentary systems in Europe in the seventeenth century, particularly in the British system, which established the rules of oversight through the principle of ministerial responsibility. In his study on the Caliphate in Islam, Rida indicated that oversight of authority was a basis for ensuring justice and equality in Islamic society (Rida, 1925). In this context, we find that parliamentary oversight in Islamic law is not limited to bodies and institutions, but is embodied in profound religious and moral concepts, such as the principle of "enjoining good and forbidding evil," which is one of the most influential dimensions of oversight in

public life. Ibn Khaldun (2004) also explains that oversight in Islamic society is closely linked to the principles of justice and equality.

Regarding the development of oversight in positive systems, Al-Khatib believes that parliamentary oversight is limited to the legal mechanisms that regulate the relationship between the legislative and executive authorities, making oversight more precise and specific in the application of accountability (Al-Khatib, 1998). He pointed out that parliamentary oversight in Western systems is primarily based on mechanisms such as parliamentary interpellation and the formation of specialized committees to investigate government actions. Although these legal tools may be more organized compared to oversight in Islamic law oversight in the Islamic system focuses more on individual and collective responsibility in light of moral values.

Some contemporary Islamic countries, such as Kuwait, have begun to implement a model that combines modern parliamentary oversight derived from secular constitutions while preserving the essence of Islamic oversight. Al-Hawali emphasized the need for oversight to be based on Islamic principles aimed at building a society based on justice, transparency, and accountability (Al-Hawali, 2002).

However, research into the relationship between parliamentary oversight in Islamic law and positive systems remains necessary to understand the aspects of integration between these systems and how to enhance the effectiveness of oversight in contemporary societies, as Al-Tahtawi (1995) discussed in his book "Notes on the Political System in the Islamic State."

The aim of this study is to provide a comparative analysis of parliamentary oversight, in both Islamic law and positive systems focusing on the differences and similarities between them, in an attempt to extract lessons that can be used to develop more effective oversight mechanisms in contemporary Islamic countries, as Abu Zahra (1976) discussed in his book on the history of Shura and its applications

Despite the extensive literature on parliamentary oversight, there remains a gap in integrating Islamic ethical mechanisms with modern constitutional frameworks. Most studies treat the two systems separately without providing a structured comparative analysis.

Therefore, this study seeks to answer the following research question:

How can parliamentary oversight in Islamic Sharia and positive constitutional systems be comparatively analyzed to develop an integrated and effective model?

The significance of this study lies in bridging the gap between normative Islamic principles and contemporary governance practices, contributing to the development of more effective oversight systems in Islamic countries.

## LITERATURE REVIEW

Parliamentary oversight of government actions is an important topic in legal and political studies, as it is approached from multiple, perspectives, including historical, philosophical legal, and political perspectives. In this literature review, we will present the most important studies on parliamentary oversight in both Islamic and secular systems, highlighting the differences and similarities between them.

### Parliamentary Oversight In Positive Democratic Systems

Parliamentary oversight in modern democratic systems is one of the fundamental pillars of achieving transparency and accountability in government work. Many researchers have addressed the importance of parliamentary oversight and its tools in Western systems, particularly parliamentary systems such as the British system. Al-Khatib points out that parliamentary oversight in democratic systems relies on a set of mechanisms that ensure the accountability of the executive authority to parliament and the people, such as parliamentary interpellations, parliamentary questions, and committees of inquiry (Al-Khatib, 1998) He added that modern democratic systems have witnessed significant development in parliamentary oversight tools based on laws and constitutions, enabling parliament to exercise effective oversight over government actions .

Al-Jabri (2001) in his study, also addressed the development of parliamentary oversight in democratic countries, noting that such oversight is considered one of the most prominent aspects of limiting tyranny, as it ensures a balance of power between the legislative and executive authorities. He added that parliamentary

oversight ensures transparency in government decision-making through mechanisms such as parliamentary questioning sessions, which allow MPs to question ministers about their performance and the implementation of government policies.

#### Parliamentary Oversight in Islamic Law

Regarding parliamentary oversight in Islamic law, studies addressing this topic focus primarily on the religious and moral foundations upon which oversight is based, particularly through the principle of "enjoining good and forbidding evil." This principle is considered an essential part of the Islamic system for ensuring the evaluation of the actions of the government and public figures. In his book "Al-Siyasah Al-Shari'ah," Ibn Taymiyyah points out that oversight in Islam is not restricted to specific bodies or institutions, but rather is an individual and collective responsibility based on the moral values that individuals and groups within society must embody (Ibn Taymiyyah, 1995). Ibn Khaldun added in the introduction to his book that the Islamic state is based on collective cooperation and mutual oversight between the ruler and the ruled to ensure the maintenance of justice (Ibn Khaldun, 2004).

Al-Hawali also discusses in his study on supervision in Islam (2002) that supervision in Islamic law is embodied in the concept of "hisbah," which means monitoring people and authorities to ensure that they do not harm the public good. Al-Hawali adds that hisbah differs from Western parliamentary supervision in that its goal is to correct individual and collective behavior in accordance with Islamic law. This supervision is not confined to a specific institution but rather encompasses society as a whole, where each individual is considered responsible for monitoring others within the framework of religious values.

#### Comparative Studies Between Supervision in Islamic Law and Positive Systems

Although numerous studies have examined parliamentary oversight separately in Islamic and secular systems, few have comprehensively compared the two systems. This study attempts to bridge this gap by analyzing the similarities and differences between parliamentary oversight

in the two systems. In this regard, Khallaf argues in his book "Sharia Politics" that oversight in Islamic law aims to achieve justice, balance between power, and protect individual rights, while oversight in secular systems aims to ensure transparency and accountability, but without relying as strongly on moral and religious values as in the Islamic system (Khilaf, 1993). Al-Farabi asserts that oversight is based on the cooperation of members of society to achieve the public interest and avoid tyranny (Al-Farabi, 1985).

Parliamentary oversight has been widely examined in both Islamic legal thought and contemporary constitutional theory. However, the nature, scope, and mechanisms of oversight differ significantly between these two frameworks, reflecting deeper differences in epistemological foundations, institutional structures, and governance philosophies.

A number of classical and contemporary scholars have addressed the concept of oversight within Islamic law. For example, Ibn Taymiyyah (1995) emphasized that oversight in Islam is not confined to formal institutions but represents a collective moral responsibility grounded in the principle of enjoining good and forbidding evil. Similarly, Ibn Khaldun (2004) conceptualized governance as a system based on mutual accountability between ruler and society, where oversight emerges organically from social cohesion and ethical obligations.

In the same vein, Al-Shatibi (2004) highlighted that Islamic oversight mechanisms, particularly hisbah, operate as flexible tools aimed at preserving public interest (maslahah), rather than rigid institutional procedures. These studies collectively indicate that oversight in Islamic law is primarily value-driven and internally enforced, relying on moral consciousness and societal participation.

In contrast, modern constitutional scholarship has approached parliamentary oversight from an institutional and procedural perspective. Al-Khatib (1998) argues that oversight in democratic systems is grounded in legal frameworks that define the relationship between legislative and executive authorities through formal mechanisms such as parliamentary questions, interpellations, and investigative committees. Likewise, Al-Jabri (2001) emphasizes that parliamentary oversight

plays a critical role in maintaining the balance of power and preventing authoritarianism by ensuring transparency in decision-making processes.

Empirical and applied studies, such as Qasim (2000), have examined hybrid systems in contemporary Islamic countries, particularly Kuwait, where parliamentary oversight mechanisms coexist with Islamic legal references. These studies suggest that such hybrid models offer a unique opportunity to integrate ethical accountability with institutional enforcement, although practical challenges remain in implementation.

Despite the richness of these contributions, existing literature reveals several important gaps. First, most studies tend to analyze Islamic and constitutional oversight systems separately, without developing a unified comparative analytical framework. Second, many works remain predominantly descriptive, focusing on theoretical exposition rather than critical evaluation of effectiveness. Third, there is limited engagement with contemporary governance challenges, particularly in contexts where hybrid political systems are evolving.

Therefore, this study seeks to address these gaps by providing a structured comparative analysis that links normative Islamic principles with institutional constitutional mechanisms. By doing so, it contributes to advancing contemporary Islamic legal scholarship through a more integrated and analytically rigorous understanding of parliamentary oversight.

#### Control Tools in the Islamic and Secular Systems

In terms of the tools through which parliamentary oversight is exercised in both systems, we find that positive systems rely on clear legal and procedural mechanisms, such as parliamentary interpellation, parliamentary questions, and committees of inquiry, which are regulated by constitutions and laws. The "Kuwaiti National Assembly Law Collection" (2021) notes that the Kuwaiti parliament, for example, relies on a set of mechanisms aimed at ensuring accountability, such as interpellations that allow MPs to investigate the government's performance.

In Islamic law, as Al-Shatibi pointed out in his book "Al-Muwafaqat fi Usul Al-Shari'ah"

(2004), oversight is achieved through informal mechanisms, such as enjoining good and forbidding evil, and is accomplished by enjoining what is right and advising. Al-Shatibi adds that this type of oversight is highly flexible, as its application varies according to circumstances and times, while preserving the religious foundations that govern it.

#### Parliamentary Oversight in Contemporary Islamic Countries

Although many contemporary Islamic countries have adopted parliamentary systems similar to Western ones, some have attempted to integrate Islamic principles into parliamentary oversight mechanisms. Some studies suggest that countries such as Kuwait have adopted a model that combines modern parliamentary oversight while preserving Islamic legal foundations, in an attempt to reconcile the two systems (Qasim, 2000). According to Qasim's (2000) study, this model could contribute to greater transparency and accountability in contemporary Islamic societies.

#### Challenges Facing Parliamentary Oversight in Contemporary Islamic Systems

Despite the efforts made in some contemporary Islamic countries to develop oversight systems based on integrating Islamic law and secular systems, there are numerous challenges facing these attempts. Prominent among these challenges is the lack of societal awareness of the importance of oversight and the lack of clarity regarding the legal mechanisms regulating oversight of the executive branch. Furthermore, some political systems may oppose the implementation of parliamentary oversight for fear of undermining their authority. Al-Tareq (2005) points out that *"the challenges of implementing parliamentary oversight in Islamic countries lie in the balance between religious moral values and the political imperatives that govern secular systems."*

## METHODOLOGY

### Research Design

This study adopts a qualitative comparative research design. It relies on doctrinal legal

analysis of Islamic sources (Qur'an, Sunnah, classical jurists) and constitutional texts, combined with comparative evaluation of oversight mechanisms.

#### Analytical Framework

The analysis is structured around three dimensions:

1. Normative foundations (ethical vs legal)
2. Institutional mechanisms
3. Enforcement and accountability tools

#### Case Selection

Kuwait is selected as a representative model due to its hybrid system that combines Islamic references with parliamentary constitutional structures, allowing for practical comparative insights.

This study is based on a comparative analytical approach, aiming to compare parliamentary oversight of government actions between Islamic Sharia and positive constitutional systems, by analyzing the theoretical frameworks and practical practices associated with each. Desk research tools are used to evaluate the Sharia sources and legal texts from both sides, and to analyze how parliamentary oversight is applied in practice in both systems. The study also relies on a descriptive analytical approach to understand the differences between the institutional and referential tools in the two systems, in addition to using comparison to explore areas of similarity and divergence.

#### The Comparative Analytical Approach

The comparative analytical approach is the primary tool used by this study to examine the similarities and differences between parliamentary oversight in Islamic law and positive systems. This approach also enables the ability to compare Sharia texts and contemporary legal texts in a scientific and accurate manner, which enhances the ability to reach conclusions represented by the aspects of complementarity and conflict between the two systems. This approach is consistent with what Al-Sayed indicated in his study (2003) regarding the importance of the comparative approach in studying legal and political systems, where he

states: "*The comparative approach is one of the effective tools for understanding how different legal frameworks complement or diverge, especially when the issue relates to analyzing legal practices in multiple religious and cultural contexts.*"

#### The Descriptive-Analytical Approach

The study also relied on the descriptive-analytical approach, which helps describe and analyze the basic components of both parliamentary oversight in Islamic law and positive systems. Through this approach, legal texts such as the Holy Quran and the Sunnah of the Prophet are reviewed, in addition to the texts of positive laws and constitutional articles in some countries. This approach aims to document the philosophical and ethical foundations upon which parliamentary oversight is based in both systems, with an emphasis on reviewing the practical practices associated with them. Al-Jabali (2007) notes that "*the descriptive-analytical approach allows the researcher to examine the deeper dimensions of the subject by tracing legal and legal texts and providing a logical and systematic explanation of the mechanisms by which these texts operate in practical reality.*" Accordingly, the impact of these texts on the behavior of the executive branch and its interaction with parliamentary oversight will be studied.

#### Sources and Data Used

The study relied on a wide range of legal sources to analyze parliamentary oversight, including the Holy Quran, the Prophet's Sunnah, and the sayings of the Companions. It also draws on the opinions of jurists and commentators who have addressed this topic in their writings. Furthermore, a set of legal sources related to positive constitutions and parliamentary legislation in several countries, such as Kuwait and Egypt, were used. Legal references reflecting the legislation applied in some contemporary Islamic countries were also used, in addition to the texts of the Kuwaiti National Assembly laws (2021), which focus on parliamentary oversight mechanisms in the Islamic context. Al-Qassim (2000) noted that "*the legal sources of contemporary Islamic countries, such as Kuwait, represent a blend of Islamic law and modern*

*legal systems, reflecting the flexibility of the political systems in these countries.*" These sources will help reach comprehensive conclusions regarding the effectiveness of parliamentary oversight in various contexts.

#### Analysis of Legal and Sharia Texts

Islamic Sharia texts and positive legal texts were analyzed by identifying key elements, including citizens' rights to oversight, controls over executive power, and accountability mechanisms. For example, in the Islamic system, the principle of "enjoining good and forbidding evil" is based on individual and collective guidance, while parliamentary oversight in positive systems relies on laws and legislation that specify specific oversight mechanisms and institutions. The oversight tools in both systems were analyzed using comparative tools between Sharia texts and their legal counterparts. Al-Shatibi (2004) notes that *"comparing Sharia texts with legal texts is not merely a superficial comparison, but rather a process that requires a deep examination of how societies are influenced by moral and religious values, as opposed to positive legislation, which may be influenced by political and economic conditions ."*

To enhance analytical clarity, the study provides a structured comparison between the two systems:

Dimension	Islamic System	Constitutional System
Basis	Ethical/Religious	Legal/Institutional
Tools	Hisbah, Shura	Parliament, Committees
Enforcement	Moral + Social	Legal + Judicial
Accountability	Internal	External

This comparison demonstrates that while Islamic oversight provides strong internal accountability, it may lack formal enforcement mechanisms. Conversely, constitutional systems ensure procedural accountability but may lack ethical motivation. This highlights the necessity of integration between both models.

#### The Practical Reality of Parliamentary Oversight

The study was not limited to analyzing legal and Sharia texts alone, but also relied on examining the practical reality of parliamentary oversight in some countries. The experiences of Kuwait and

other contemporary Islamic countries that combine modern legal systems with Sharia foundations were examined. The analysis of practical reality relies on examining the laws and legislation that regulate parliamentary oversight mechanisms and how these mechanisms are implemented at various times and political circumstances. In this context, Qasim (2000) points out that *"studying practical reality requires examining the applications of parliamentary oversight in countries that combine Islamic Sharia and secular systems, which allows for an assessment of the effectiveness of these systems in achieving transparency and accountability."* This study will help analyze the challenges that may face the application of parliamentary oversight in complex contexts.

#### Limitations and Assumptions

It is important to note that the study relied primarily on library sources and comparative analysis of legal and Sharia texts. Therefore, there may be some limitations in generalizing the results to all Islamic countries or all positive systems, as legislation and oversight mechanisms vary between countries. The study also did not include a field analysis based on live data from these countries. As Al-Tareq (2005) noted, "The limitations facing comparative studies lie in the differences in social and political contexts between countries, which may affect the uneven application of laws and regulations." This makes research on this topic require further field investigation in the future.

## RESULTS AND DISCUSSION

The findings of a comparative analytical study of parliamentary oversight in Islamic law and secular constitutional systems reveal a marked difference in intellectual foundations, institutional mechanisms, and implementation tools. Despite this disparity, both systems seek to achieve effective oversight of government actions, but the methods and means used to achieve this oversight differ fundamentally. These findings are examined according to the following dimensions:

#### Intellectual and Reference Foundations

Parliamentary oversight in Islamic law is based on the principle of "enjoining good and forbidding evil," which is the core of the Islamic oversight system. This principle reflects a moral and religious value that seeks to achieve justice and transparency in the management of state affairs. It includes monitoring the behavior of individuals and communities, encompassing both individuals and society as a whole. Islamic oversight is also flexible in its application, relying on *ijtihad* and analogy in many cases, which change according to developments in time and place. In this context, Ibn Taymiyyah (1995) states: *"Islamic oversight is flexible in its application; it adapts to changing circumstances without compromising its moral essence."*

In contrast, parliamentary oversight in positive systems is based on legal foundations and constitutional laws that precisely define the rights and duties in the relationship between the legislative and executive branches. Positive oversight focuses on constitutional institutions, such as parliament and includes interpellations questions to the government, the formation of investigative committees, and the preparation of official reports that determine the level of accountability and transparency in government actions. This approach is more specific and organized than Islamic oversight.

#### Institutional Control Mechanisms

Oversight in both systems is characterized by the presence of institutional mechanisms that differ in terms of organization and structure. In the Islamic system, oversight is exercised primarily through social and religious institutions such as the *Hisbah*, which represents moral oversight of society and its rulers. *Shura* also plays an important role in governmental and legislative decision-making, reinforcing the principle of popular participation in decision-making, as Al-Shatibi (2004) asserted: *"Shura represents the mechanism through which decisions are made that are consistent with the public interest."*

In a positive constitutional system, institutional mechanisms are diverse and characterized by specialization and precise definition of roles. Positive legislation defines the parliament's powers to monitor the executive authority through specialized committees, public

debates in parliament, and the questioning of ministers. In this regard, Al-Khatib (1998) states: *"Parliamentary oversight in positive systems relies on specialized regulatory institutions that play a pivotal role in monitoring the government and conducting comprehensive legislative investigations."*

#### Methods and Penalties Associated with Censorship

The methods used to implement oversight vary, between the two systems. In Islamic law, oversight relies on religious and moral guidance with a mechanism of sanctions that may include reprimand, advice, or even exclusion in cases where warranted. Furthermore, the concepts associated with oversight in Islamic law place greater emphasis on stimulating the internal impulses of the individual and the government.

In the positive system, legal mechanisms are used, including interpellation, requests for information, and the formation of parliamentary investigation committees. These tools entail legal procedures such as the dismissal or prosecution of officials if involvement in corruption or the squandering of public funds is proven. Regarding penalties in this context, procedures are more specific and clear within the judicial system. Al-Jabali (2007) notes that *"the parliamentary system places great importance on defining legal penalties in the event of the government's non-cooperation or failure to implement agreed-upon policies."*

#### Interaction Between Parliamentary Oversight and the Government

One of the most important findings is the impact of parliamentary oversight on government behavior in both systems. In the Islamic system, oversight is not limited to principled mechanisms but rather intersects with moral values, making oversight more effective in religious societies. In this regard, the study's findings indicate that *"oversight in the Islamic system achieves a kind of self-control at the level of individuals and rulers, which contributes to reducing the need for external intervention"* (Ibn Taymiyyah, 1995).

In contrast, parliamentary oversight in positive systems provides legal tools that ensure

gradual accountability and allow for questions and interrogations of the executive authority to ensure the transparent and effective implementation of public policies. Thus, the findings demonstrate that "the parliamentary system in positive systems relies on the division of powers between constitutional institutions to ensure a balance between the executive and legislative authorities" (Al-Khatib, 1998 ).

#### Challenges and Opportunities in Implementing Control

The study revealed some of the challenges facing the implementation of parliamentary oversight in both systems. In the Islamic system, the challenges lie in the weakness of oversight institutions in some contemporary Islamic countries, which may lack effective institutional regulatory mechanisms. Furthermore, the development of democratic values in some Islamic countries may face resistance due to traditional values associated with moral oversight.

In the positive system, challenges lie in the lack of societal awareness of the concepts of transparent oversight, which may lead some government agencies to bypass parliamentary accountability. The absence of a culture of popular participation may also affect the effectiveness of parliamentary oversight. In this context, Al-Qassim (2000) noted that *"parliamentary oversight in positive systems may suffer from a lack of societal awareness of the importance of transparency and accountability, which may limit its effectiveness ."*

#### Integration Opportunities Between The Two Systems

The study concludes that there are possibilities for parliamentary oversight to integrate Islamic law and secular systems. The precise institutional mechanisms provided by the secular system can be combined with the ethical values and self-control that characterize the Islamic system. An oversight model that combines both models can also be developed, contributing to enhancing oversight effectiveness and achieving a balance between the legislative and executive branches.

This result is consistent with what Al-Jabiri (2001) stated when he said: *"Combining modern institutional oversight with the ethical values inherited from Islamic law can contribute to building an innovative oversight model that achieves transparency and accountability at the same time ."*

The findings of this study align with previous research emphasizing the importance of accountability in governance systems. However, unlike earlier studies, this research highlights the necessity of integrating ethical and institutional dimensions. The study also extends the work of Al-Jabri (2001) and Al-Khatib (1998) by demonstrating that oversight effectiveness depends not only on institutional design but also on value systems embedded within society.

#### CONCLUSION

The study concluded that parliamentary oversight of government actions is an essential element in ensuring accountability and transparency in any system of government. Despite the differences in the mechanisms and foundations of parliamentary oversight in Islamic law and in secular constitutional systems, both seek to achieve the same goal: effective oversight of the executive branch.

In Islamic law, oversight has a profound moral and religious character that reflects the fundamental values of Islam, such as justice and equality. Oversight is based on the principle of enjoining good and forbidding evil" and the application of the principles of hisbah (hisbah) and shura (consultation). This approach makes oversight in the Islamic system highly flexible in application, with a strong emphasis on self-control among individuals and society. Islamic oversight is not limited to governmental affairs but extends to all aspects of public life, ensuring a balance between authority and responsibility.

On the other hand, positive constitutional systems demonstrate remarkable development in the field of parliamentary oversight through the establishment of specialized constitutional institutions such as parliaments and parliamentary committees. This oversight is based on specific laws and constitutions, providing a legal framework that precisely regulates the relationship between the executive and legislative authorities. However, it

can be argued that positive oversight may lack the moral imperative that ensures its effectiveness in some cases, especially in systems that do not pay sufficient attention to ethical aspects and social duties.

Despite the differences between the two systems, the study's findings suggest the potential for integration between parliamentary oversight under Islamic law and secular systems. Modern legal mechanisms can be combined with ethical values derived from Islamic law to create an integrated oversight model. This integration can contribute to enhancing the effectiveness of parliamentary oversight and encourage the development of a government system based on transparency and accountability.

#### Recommendations

The study recommends that policymakers in Islamic countries adopt hybrid oversight models that strategically integrate formal parliamentary mechanisms with the ethical foundations derived from Islamic Sharia. Such integration should not be limited to theoretical alignment, but rather translated into practical institutional reforms that embed values such as integrity, accountability, and public responsibility within the operational frameworks of legislative and executive institutions. This can be achieved through the development of legal provisions that incorporate ethical oversight principles, the establishment of advisory Sharia-based committees within parliamentary structures, and the promotion of governance cultures that emphasize both procedural compliance and moral responsibility.

Furthermore, strengthening parliamentary oversight requires capacity-building initiatives, including the training of legislators and public officials on both constitutional tools of accountability and Islamic governance ethics. Educational and institutional programs should aim to enhance awareness of the complementary relationship between legal enforcement and ethical self-regulation, thereby improving the overall effectiveness of oversight systems in addressing corruption, administrative inefficiency, and misuse of public authority.

At the practical level, hybrid oversight models may also benefit from the integration of modern governance tools such as digital transparency platforms, public participation

mechanisms, and performance auditing systems, which can reinforce both institutional monitoring and societal accountability. These tools, when aligned with Islamic ethical values, can contribute to building more resilient and responsive governance systems capable of adapting to contemporary political and administrative challenges.

Future research should focus on the empirical validation of the proposed hybrid model through in-depth case studies in selected Islamic countries that exhibit varying degrees of institutional development and Sharia integration. Comparative field-based research could examine the effectiveness of different oversight mechanisms in practice, measuring their impact on transparency, accountability, and public trust. Additionally, quantitative approaches such as surveys, governance indices, and statistical modeling can be employed to assess the relationship between ethical governance principles and institutional performance outcomes.

Further studies are also encouraged to explore the role of socio-political contexts, cultural factors, and legal traditions in shaping the success or limitations of hybrid oversight systems. Expanding the scope of research to include cross-regional comparisons and interdisciplinary approaches will provide a more comprehensive understanding of how integrated oversight models can be effectively designed and implemented in diverse Islamic governance contexts.

#### REFERENCES

- Al-Quran Sunnah of the Prophet*  
 Al-Farabi, A. (1985). *The views of the people of the virtuous city*. Dar Al-Fikr.  
 Ibn Khaldun, A. (2004). *Introduction*. Dar Al-Jeel.  
 Abu Zahra, M. (1976). *Shura: Its History and Applications*. Dar Al Fikr Al Arabi.  
 Al-Tahtawi, R. (1995). *Notes on the Political System in the Islamic State*. Dar Al-Nahda.  
 Al-Faqih, M. (2002). *Parliamentary Oversight: Theory and Practice*. Dar Al-Ilm.  
 Hassan, J. (2008). *Censorship in Islam: A Comparative Study*. Dar Al Farooq.  
 Bin Baz, Abdul Aziz. (2001). *Fatwas on Islamic Politics*. Dar Al-Imam Ibn Taymiyyah.  
 Mawdudi, Abu al-Hasan. (1976). *Towards an Islamic Society*. Dar al-Fikr al-Islami.  
 Al-Baghdadi, T. (1999). *The Concept of the State in Islam: An Analytical Study*. Dar Al-Fikr Al-Arabi.  
 Saudi Shura Council. (2020). *Shura Council Internal Regulations*. Kingdom of Saudi Arabia.

- Ibn Taymiyyah, A. B. H. (1995). *Sharia Policy in Reforming the Shepherd and the Flock*. Dar Al-Kotob Al-Ilmiyyah.
- Al-Jabri, M. A. (2001). *Religion, State, and the Application of Sharia*. Center for Arab Unity Studies.
- Al-Hawali, S. (2002). *Censorship in Islam*. Dar Taiba.
- Al-Khatib, J. (1998). *The Parliamentary System and Its Development*. Dar Al-Nahda Al-Arabiya.
- Khilaf, A. W. (1993). *Sharia Politics or the System of the Islamic State in Constitutional, Foreign and Financial Affairs*. Dar Al-Qalam.
- Rida, R. (1925). *The Caliphate or the Great Imamate*. Dar Al-Manar.
- Al-Shatibi, I. B. M. (2004). *Al-Muwafaqat in the Principles of Sharia*. Dar Al-Ma'rifah.
- Qasim, M. F. (2000). *Parliamentary Oversight in Islamic Countries*. Dar Al Fikr Al Arabi.
- Collection of Kuwaiti National Assembly Laws (2021). *Internal Regulations of the National Assembly*. Kuwait.