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SYSTEMATIC LITERATURE REVIEW ON EUROPEAN ZAKAT STUDIES

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ABSTRACT

This study systematically reviews the literature on zakat in Europe to examine the development, practices, regulatory frameworks, institutional arrangements, and socioeconomic contributions of zakat across European contexts. Using a systematic literature review (SLR) approach guided by the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) framework, the study identified, screened, and analyzed relevant publications indexed in the Scopus database. The review initially retrieved 871 records using the keyword "zakat." After a systematic screening and eligibility assessment, 18 publications that specifically addressed zakat in European countries were selected for qualitative synthesis. The analysis examines the conceptual and theological foundations of zakat, its implementation within Muslim communities, governmental and legal arrangements, the development of zakat institutions, the involvement of Islamic financial institutions, and challenges affecting zakat management in Europe. The findings reveal diverse legal, regulatory, and institutional approaches to zakat across European countries. Although government involvement differs by national context, zakat institutions contribute to the administration and distribution of zakat and support various social and economic initiatives. The review also identifies gaps in the existing literature, particularly concerning governance, institutional effectiveness, digitalization, and the socioeconomic impact of zakat in European settings. This study contributes to a more comprehensive understanding of zakat as an Islamic social-finance instrument in Europe and offers directions for future research.

Keywords: zakat studies; Europe; zakat practice; systematic literature review; Islamic social financial institutions.

INTRODUCTION

A Muslim who believes should know everything about Allah's commands and prohibitions, one of which is the 3rd pillar of Islam, namely zakat. Zakat is an obligation under Islamic law carried out by every individual with wealth and income to pay zakat for charitable and religious purposes (Islamy & Hannase, 2021; Mustika et al., 2019; Wijayanti et al., 2022). Zakat can also be interpreted as the main component in Islamic financial instruments to balance the distribution of state wealth fairly (Huda, 2022; Masse et al., 2024; Rosyadi & Khatimah, 2020). The results of zakat distribution can positively and significantly affect economic growth, investment, and consumption (Ashfahany, 2023; Suprayitno, 2019).

Poverty is the main population problem in various countries. As a centralized system, zakat can alleviate poverty (Suryani & Fitriani, 2022). Each country has a different way of practicing and managing zakat. Efficient zakat management can improve quality, especially among Muslims (Rusydiana & Al-Farisi, 2016).

It can be said that the growth of the Muslim population in Europe has seen significant progress in recent years (Wildan & Husein, 2021). According to a report by the Pew Research Center in 2017, the Muslim population in Europe (including 28 countries of the European Union, Norway, and Switzerland) reached 25.8 million people or 4.9% of the total population by mid-2016 (Pew Research Center, 2017). This figure increased from 19.5 million people (3.8%) in 2010 (Pew Research Center, 2017). If Muslim migration to Europe stops completely, the Muslim population in Europe is expected to continue to increase to 7.4% by 2050. This growth shows that Muslims have become an integral part of European society and contribute to the cultural and social diversity of the continent (Garde, 2017).

Thus, this study compiled a systematic literature review related to zakat studies in Europe to reveal the development of European zakat studies from several aspects, such as trends in the number of publications, the most productive authors, subject areas, publication sources, and cited articles. In addition, this study aims to synthesize several studies related to zakat in Europe. This research is expected to add useful literature and provide a direction for European zakat research in the future, especially for the public in general.

Nowadays, developments in research publications in the Islamic world are proliferating, especially in the field of zakat, because trends and publications about zakat have experienced a significant increase (Alshater et al., 2021; Sawandi & Aziz, 2021; Sawmar & Mohammed, 2021). One of the Zakat Literature Studies that have been published is a study by Supriani et al. (2022), which shows that many studies raised the discussion of zakat, especially between 2014 and 2019. The quantity of zakat research increased sharply, and then, in the study, it was illustrated that research in the field of zakat is still a favorite in several Asian countries. However, very few Europeans have researched zakat and other things related to zakat in Europe.

Rukmana (2022) conducted a literature-based qualitative research methodology, which uses a literature approach. In the literature, he explained a lot about how zakat was applied and its practice during the time of the Prophet until the period of the Islamic Caliphate, then entered the contemporary or modern period; in the study, he also presented a discussion about how zakat is regulated in Indonesia, which turns out to have similar regulations to those of the state of the majority of other Muslims such as Malaysia, Saudi Arabia, UAE and others.

Ahmed and Abderrazak (2016) found that, with the set period (1964 – 2015), researchers compared or associated zakat with the plane hijacking incident on 11 September 2001. In the research carried out, there was undoubtedly little discussion about terrorism; terrorism was the background against which he researched because his research at that time was influenced by the stigma condition of western society towards zakat, which was considered an effort to support terrorism funds.

While the aforementioned studies examine zakat from a chronological perspective, other literature reviews have focused on the role of zakat within national economic systems. These reviews also discuss the evolution of zakat management from the period of Prophet Muhammad (peace be upon him) through the caliphate era, as well as contemporary zakat-management practices in various countries (Amiruddin, 2015). However, these studies provide limited discussion of zakat in the European context, particularly regarding its historical development and governance.

The preceding discussion indicates that scholarly research on zakat in continental Europe remains limited. Relevant journal publications addressing the development, practice, and governance of zakat within European countries are particularly scarce. This gap persists despite the continued growth of Muslim populations across Europe, highlighting the need for further research on the development and management of zakat in European contexts.

METHOD

This research uses a Systematic Literature Review (SLR). SLR is a term used to refer to a specific study or research methodology and development carried out to collect and evaluate research related to the focus of a particular topic (Triandini et al., 2019).

SLR research is carried out for various purposes, including identifying, reviewing, evaluating, and interpreting all available research with topic areas of interest and specific relevant research questions (Barricelli et al., 2019). This study is a type of qualitative research with a systematic review of the literature. The SLR method can also show how extensive research has been conducted and give an overview of where the different research positions are and are not.

The process of the SLR itself will use PRISMA (Preferred Reporting Items for Systematic Review and Meta-Analyses) diagrams to simplify the process of compiling to the selection stage and determine the quality of the articles to be used. PRISMA is a report of evidence of a stage in a systematic review and meta-analysis (Riyadi, Wahidin, and Elanda, 2022). The entire article selection process used in this study is arranged through a series of systematic and accurate stages. The data series used is data downloaded directly from Scopus. The researcher reviews several articles that have been selected and considered based on the topic to be analyzed. The Scopus database uses keywords in literature searches to determine the selection strategy (Qureshi et al., 2020). There are three processes, namely identification, screening, and inclusion of articles in the PRISMA 2020 flowchart, as illustrated by Figure 1.

From the data displayed in the PRISMA diagram above, it is clear that many articles are excluded. The first time the researcher searched for the data (21 May 2023) through Scopus, there were 871 journals with the keyword "Zakat"; the number decreased after being screened. The initial search using the general keyword "zakat" yielded a substantial number of publications. From this pool, the study identified and inventoried literature that indicated a connection between zakat and Europe. The records were then screened systematically through title, abstract, and full-text assessment to evaluate their relevance to the study objectives. Following this in-depth screening process, 18 publications were retained because they specifically and substantively addressed zakat in European countries.

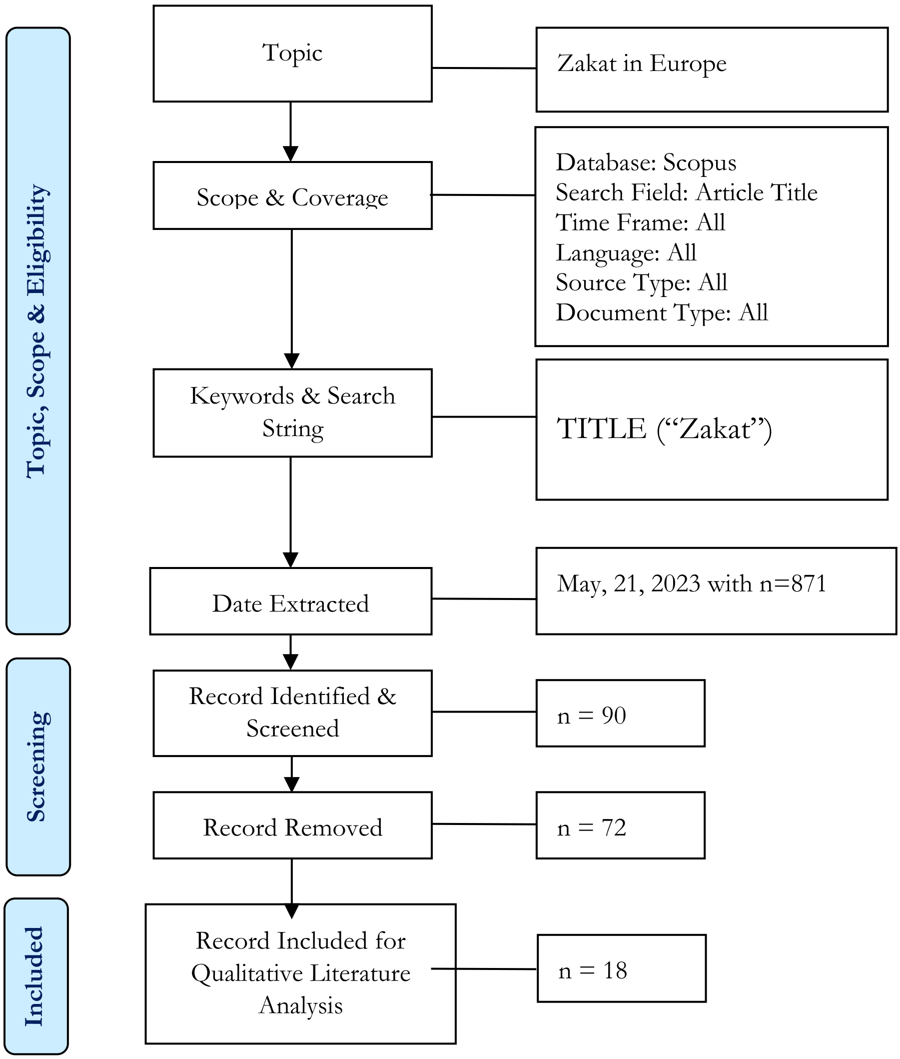

Figure 1: Flow diagram of the search strategy

RESULTS AND DISCUSSION

In this study, two types of discussion results will be presented, namely Descriptive Analysis and Qualitative Synthesis Analysis, by classifying the discussions in the research related to European Zakat.

Below is a research graph based on the year of study, as shown in Figure 2. In the graph, it can be seen that there is a rapid increase in studies in the range of 2018 – 2019 and a flat graph in previous years, so research related to zakat tends to be stagnant, while the exact cause of the rapid increase in this period cannot be ascertained.

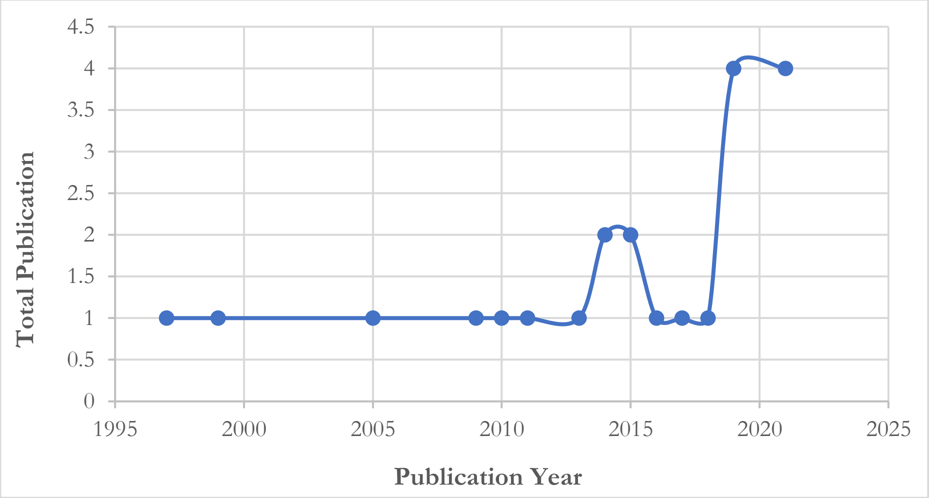

Figure 2: Publication Trends by Year

In Table 1 below, from the reviewed literature that has been compiled, there are research areas discussed by researchers. There are several areas of discussion in the research sub-area, the two most significant of which are Social Sciences, then Arts and Humanities, regarding the reason why of the various zakat studies the most discussion areas are precisely from the fields of Social, Arts & Humanities, instead of Religious Science, because in the discussion of the humanities, the benefits of zakat are used as the leading barometer of discussion output.

Table 1: Publications by Subject Area

Subject Area	TP	Percentage%
Social Sciences	17	42,50%
Art and Humanities	12	30,00%
Business, Management and Accounting	4	10,00%
Economics, Econometrics and Finance	4	10,00%
Environmental Science	1	2,50%
Medicine	1	2,50%
Physics and Astronomy	1	2,50%

Looking at the content of the discussion related to the reasons above, it can be concluded that the topic of zakat is not only a religious obligation for Muslims. Muslims must believe in the existence of zakat. Besides that, they must also increase the obligation of zakat so that the problem of poverty in various places is solved.

Table 2: Publications by Subject Area

Country	Total Publication	Percentage%
United Kingdom	12	40,00%
Russian Federation	2	6,67%
Switzerland	2	6,67%
Belgium	1	3,33%
Finland	1	3,33%
Italy	1	3,33%
Serbia	1	3,33%
Spain	1	3,33%
Sweden	1	3,33%
Turkey	1	3,33%

The United Kingdom accounts for the largest number of publications in the selected literature, with a substantially higher number than other European countries. This pattern may reflect the prominence of the United Kingdom as research setting for studies of Muslim communities, Islamic philanthropy, and zakat; however, the present review does not establish a causal relationship between the country's demographic characteristics and publication output. The United Kingdom's relevance as a research context may also be associated with its sizeable and growing Muslim population. In England and Wales, the Muslim population increased from 2.7 million (4.9% of the population) in 2011 to 3.9 million (6.5%) in 2021 (Office for National Statistics, 2022).

Table 3: Top 5 Publications based on citations

Title	Total Citations	Citation Per Year
Financial worship: The Quranic injunction to almsgiving	74	3,08
God, gifts and poor people: On charity in Islam	66	4,71
Muslim perspectives on welfare	50	1,92
The influence of the Muslim religion on humanitarian aid	33	1,83
Political Piety: The Politicization of Zakat	9	0,9
Financial worship: The Quranic injunction to almsgiving	74	3,08

Citation counts are reported as an indicator of the relative scholarly visibility of the reviewed publications; however, they should not be interpreted as the sole measure of research quality. From Table 3 below, it can be seen that the article with the most citations from the reference journals that we compiled falls on the article or journal entitled "Financial Worship; The Quranic Injunction to Almsgiving" by Benthall (1999) with a percentage of 3% and, with many citations of 74, and Next article by Thierry (2009) entitled "God, Gifts, and People; On Charity in Islam" has 66 Citations, followed by "Muslim Perspective on Welfare" by Dean and Khan (1997) with a total of 50 citations, then from Krafess (2005) A total of 33 and last by Samantha (2013) a total of 9 citations.

The two most frequently cited articles share a common emphasis on the social dimensions of zakat. Their high citation counts may indicate the relevance and scholarly influence of research that examines zakat beyond its religious function, particularly in relation to social welfare, charitable practices, and socioeconomic development.

Tree Map Analysis in Zakat European Studies

Furthermore, the analysis is based on the TreeMap. The Tree Map is a data visualization technique that uses nested boxes to display the data hierarchy and highlight color differences, which represent differences in the information displayed. In this study, the treemap helps visualize the mapping of the concept of research designed by Vernier et al. (2020) for the application used, namely Nvivo, which divides the discussion display area in the journal we collected.

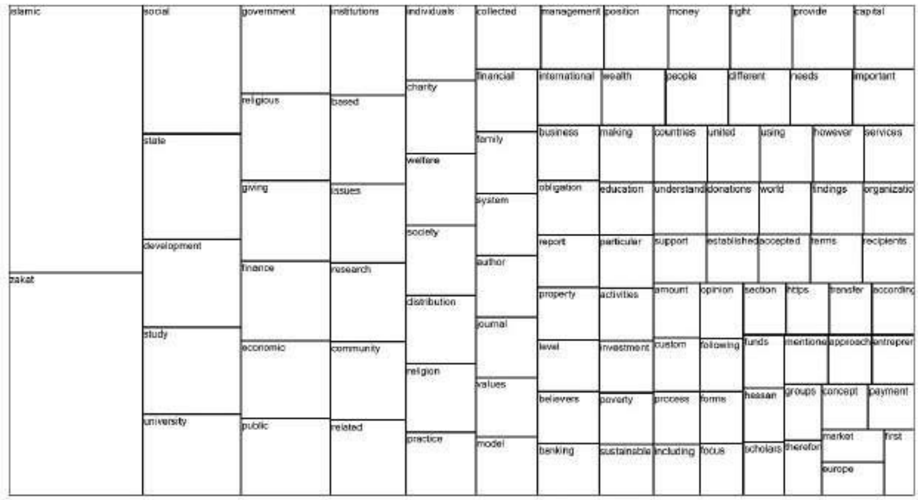

Figure 3: Tree Map Analysis of European Zakat Studies

The display of the Tree Map shows that the words Islamic and zakat are the main actors. Then, from the word Islamic, it discusses its social, government, human care, and other aspects; from the phrase zakat come out its derivatives, namely development, finance, distribution, and words that represent it, until the most miniature column indicates a small sub- discussion that is not so much discussed.

Qualitative Synthesis Analysis

Distribution Aspects	Key points	Source
Theological Perspective and Zakat Fiqh	▪ The law of zakat for Muslims. ▪ Principles of zakat in Sharia law ▪ Eight Groups of Zakat Recipients ▪ Types of Assets That Must Be Zakat	(Al-Banna & Michael, 2015), (Alshaleel, 2019)
The Practice of Zakat in the Muslim	▪ Payment of zakat and Sadaqah to Bait al-Mal al-Islami by British Muslims	(Dean & Khan, 1997), (Dragan, 2011), (Martens,

Community	▪ Zakat with invitation system and call for religious sermons by Serbia & Montenegro ▪ Form and time of Zakat Fitrah Payment in Switzerland ▪ Methods of Zakat Distribution in Switzerland ▪ Forms of distribution of zakat funds in northern Europe	2014), (Garde, 2017)
Zakat Regulations and Policies	▪ Zakat obligations ▪ Mandatory zakat requirements ▪ Amount of zakat payment ▪ Zakat in the UK ▪ Zakat distribution model ▪ Benefits of zakat	(Almarri & Meewella, 2015), (Samantha, 2019), (Hussain, 2021), (Martens, 2014), (Issam & Robbin, 2020), (Hasan, 2018), (Gundogdu A S, 2019)

Theological Perspective and Zakat Fiqh

Zakat is one of the five pillars of Islam that must be fulfilled by Muslims who have property with a certain nisab. The principles of zakat are regulated by Sharia law, which consists of moral and ethical principles that govern Muslim society, based on the Qur'an and Sunnah. As per the rules, the designated zakat recipients include the poor, zakat managers, converts, enslaved people, people in debt, those struggling in the way of Allah, and travelers (Al-Banna & Michael, 2015).

As in the Qur'an and Sunnah, several property types must be zakat, including gold, silver, money, merchandise, agricultural products, and livestock. In addition, in the Qur'an, it has also been mentioned that there are eight groups of zakat recipients (asnaf) above, with urgency and priority scale levels (Alshaleel, 2019).

The Practice of Zakat in the Muslim Community

In practice, the zakat that occurs in the European Muslim community is different; for example, the Muslim Parliament in the UK encourages British Muslims to pay zakat and voluntary charitable donations (Sadaqah) to Bait al-Mal al-Islami, which was then used in part to support philanthropic programs (such as aid to Bosnian Muslims) (Dean & Khan, 1997).

The difference from the practice of zakat in the British, Serbian & Montenegrin era of Yugoslavia was to organize zakat with an invitation or reminder system, as well as with an appeal to religious sermons conducted by the IRC (Islamic Religious Community) to improve the quality of education and religious facilities of Muslims at that time (Dragan, 2011). Then, in the practice of zakat in Switzerland, Swiss Muslims pay zakat Fitrah before Eid al-Fitr and in the form of money instead of goods, and distribute it through Islamic charitable institutions, Muslim associations, or through special zakat charity boxes in mosques (Martens, 2014).

Moving to Northern Europe (Garde, 2017)**,** Norway distributes its zakat for sports activities, health information, and various forms of social and psychological support. Sweden distributes zakat as exceptional support to families with children with disabilities. Then, in Croatia, zakat has even become an informal relief of the genetic and cultural characteristics of Bosnian Muslims. Meanwhile, Germany distributes zakat through social and educational support to 2,200 houses of worship and 70 mosques that are registered.

Zakat Regulations and Policies

Zakat is the primary obligation for every Muslim after performing Shahada and Prayer. Zakat is required for a person who has met the requirements of zakat, namely having a net worth above the minimum limit determined by sharia, paid at 2.5% of annual income or wealth after fulfilling the basic needs of the family (Almarri & Meewella, 2015).

In the UK, the local government does not officially regulate Zakat (Samantha, 2019). However, zakat is in line with English law originating from the Charity Commission, which states that the main characteristic of "Charity" is the "public good," which complements the practice and understanding of zakat as a religious obligation for the benefit of society at large. Some charities in the UK (Hussain, 2021) have changed their zakat distribution model from giving zakat money to goods, buying equipment, and paying for shelter for victims of domestic violence. Research by Martens (2014) mentioned that, in practice, Switzerland does not have a formal collection system like some other Muslim countries. However, in Switzerland, individuals generally give zakat to charitable organizations or recipients, such as by distributing it abroad or to people experiencing poverty. Some Islamic economic researchers innovate so that zakat becomes an additional source of income for those in need, such as grants or micro-credits, as a step to start a micro- business (Issam & Robbin, 2020).

According to Hasan (2018), his research implies that receiving corporate zakat and zakat payments from companies can benefit the wider community, especially those who need assistance as zakat recipients. To realize the above points, a credible zakat platform from person to person is required under the supervision of the local government so that the principle of zakat as a redistribution agent is truly realized (Gundogdu A S, 2019).

Social and Economic Impact of Zakat

Some examples of the social impact of zakat in the British charity community include distributing zakat for Islamic education, loans to British Muslim students, and grants for health and welfare for British Muslim families in need (Dean & Khan, 1997). The same thing is also done by Jam'iat Ihyaa Minhaaj Al-Sunnah (JIMAS) and the Malay Muslim Association, which distributes zakat in the form of emergency assistance, sustainable development, drilling water wells, education and skills training, access to health care, assisting in finding asylum for the homeless, as well as repayment loan assistance for Muslim students who have unpaid debts (Rodney, 2014). In the end, zakat is not just a form of worship. In addition to its religious purpose, zakat has a socioeconomic goal to reduce the gap in wealth distribution between the rich and the poor. Cutting the economic gap can prevent disintegration in the Muslim community (Norulazidah & Gareth D, 2010).

Besides that, zakat also encourages mutual care and gratitude among Muslims, with zakat beneficiaries (Mustahik) who can meet their basic needs and raise the standard of their welfare (Thierry, 2009).

FUTURE RESEARCH DISCUSSION

The development of zakat in Europe opens up broad and diverse research opportunities. Future research could explore the role of zakat in Muslim social integration in Europe, especially for the younger generation and newcomers. This research can refer to the study of the role of Islamic philanthropy in social integration in Western countries, such as research on the economic empowerment of refugees. In addition, research on the contribution of zakat to the Sustainable Development Goals (SDGs) in Europe is also promising. This research can investigate how zakat can help alleviate poverty, improve quality education, and improve public health in Europe. Relevant references include a

UN report on the role of Islamic philanthropy in sustainable development and case studies on zakat projects that impact the SDGs in Muslim countries.

Another exciting research opportunity is the integration of zakat with other Islamic social and financial instruments, such as waqf and Sukuk. This study can examine how combining these instruments can create a more significant social impact in Europe. References that can be used include research on developing zakat-based Islamic social finance products. The role of digital technology in improving the efficiency and transparency of zakat management in Europe is also a promising area of research. Case studies on successful online zakat platforms in Muslim countries and research on the application of blockchain technology in zakat management can be valuable references.

CONCLUSION

Zakat, as one of the pillars of Islam, plays an essential role for Muslims in Europe. Zakat is regulated in detail in the Qur'an and Sunnah, including the types of property that must be zakat objects, the recipient class (asnaf), and its management principles. The practice of zakat in Europe is diverse and adjusted to each country's social and cultural context. In the UK, zakat is encouraged through institutions such as Bait al-Mal al-Islami, while in Serbia and Montenegro, zakat is organized through an invitation system and calls in sermons. In Switzerland, individuals give zakat directly to charitable institutions or recipients. Zakat regulations in Europe also vary. The UK does not regulate zakat officially, but the practice of zakat is in line with charity laws. Switzerland also does not have a formal collection system. Some studies suggest that zakat be converted into an additional source of income for those in need, such as grants or microcredit. The social and economic impact of zakat in Europe is significant. Zakat has been used to support various social programs, such as education, health, emergency assistance, and sustainable development. Zakat also plays a role in reducing economic inequality, encouraging mutual care, and improving the welfare of beneficiaries. To maximize the potential of zakat, a credible and transparent zakat platform and supportive regulations are needed. Thus, zakat will be more effective in overcoming European social and economic problems.

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